

Hearing Date: March 10, 2021 at 9:30 a.m. (ET)/ 9:30 a.m. (AST)
Objection Deadline: December 7, 2020 at 4:00 p.m. (ET)/ 4:00 p.m. (AST)

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

In re:

**THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO RICO,**

as representative of

THE COMMONWEALTH OF PUERTO RICO, *et al.*,

Debtors.¹

**PROMESA
Title III**

No. 17 BK 3283-LTS

(Jointly Administered)

**FOURTH INTERIM FEE APPLICATION OF GENOVESE JOBLOVE & BATTISTA,
P.A., AS SPECIAL LITIGATION COUNSEL TO OFFICIAL COMMITTEE OF
UNSECURED CREDITORS, FOR SERVICES RENDERED AND REIMBURSEMENT
OF EXPENSES FOR PERIOD FROM FEBRUARY 1, 2020 THROUGH
AUGUST 31, 2020**

SUMMARY COVER SHEET

Name of applicant:	Genovese Joblove & Battista, P.A. (“ <u>GJB</u> ”)
Authorized to provide professional services to:	Special Litigation Counsel for the Official Committee of Unsecured Creditors (the “ <u>Committee</u> ”) ²

¹ The Debtors in these Title III cases, along with each Debtor’s respective Title III case number and the last four (4) digits of each Debtor’s federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (the “Commonwealth”) (Bankruptcy Case No. 17-BK-3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation (“COFINA”) (Bankruptcy Case No. 17-BK-3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority (“HTA”) (Bankruptcy Case No. 17-BK-3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS”) (Bankruptcy Case No. 17-BK-3566-LTS) (Last Four Digits of Federal Tax ID: 9686); (v) Puerto Rico Electric Power Authority (“PREPA”) (Bankruptcy Case No. 17- BK-4780-LTS) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority (“PBA”) (Bankruptcy Case No. 19-BK-5233-LTS) (Last Four Digits of Federal Tax ID: 3801) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

² The Committee is the official committee of unsecured creditors for all Title III Debtors, other than PBA and

Name of Client:	Official Committee of Unsecured Creditors of all Title III Debtors (other than COFINA)
Petition Date:	May 3, 2017
Date of retention:	May 31, 2019, effective as of April 16, 2019 [Docket No. 7181]
Period for which compensation and reimbursement are sought:	February 1, 2020 through and including August 31, 2020 (the " <u>Application Period</u> ")
Amount of interim compensation sought as actual, reasonable, and necessary:	\$1,124,542.00 ³
Amount of interim expense reimbursement sought as actual, reasonable, and necessary:	\$56,687.18
Are your fee or expense totals different from the sum of previously-served monthly statements for the Application Period?	No.
Total compensation approved by interim order to date:	\$657,907.05 (First Interim Fee Order ECF No. 9046) \$1,339,434.84 (Second Interim Fee Order ECF No. 13296) \$1,171,906.40 (Third Interim Fee Order ECF No. 13824)
Total expenses approved by interim order to date:	\$3,848.56 (First Interim Fee Order ECF No. 9046) \$43,602.27 (Second Interim Fee Order ECF No. 13296) \$33,296.95 (Third Interim Fee Order ECF 13824)
Total allowed compensation paid to date:	\$3,704,643.23
Total allowed expenses paid to date:	\$136,809.33
Blended rate in this Application for all attorneys:	\$499.49/hour ⁴

COFINA.

³ The full amount of fees incurred by GJB during the Application Period total \$1,124,542.00. GJB agreed taking a voluntary fee reduction equal to 20% in the amount of \$224,908.40 and, thereby, seeks allowance and payment of fees in the amount of \$899,633.60. By the time of the hearing on this Application, a portion of this amount should have been paid by the Debtors pursuant to the Interim Compensation Order, and GJB reserves its rights to seek relief from the Court to the extent any outstanding fees and expenses that are due and payable are not paid on the terms set forth in the Interim Compensation Order.

⁴ The calculation of the blended hourly rates reflected in this Application Period does not take into account GJB's

Blended rate in this Application for all timekeepers:	\$419.24/hour
Total compensation sought in this Application already paid pursuant to a monthly compensation order but not yet allowed:	\$0.00
Total expenses sought in this Application already paid pursuant to a monthly compensation order but not yet allowed.	\$0.00
Total time expended for fee application preparation during the Application Period:	7.40
Total compensation requested for fee application preparation during the Application Period:	\$1,697.00
Number of professionals included in this Application:	18
If applicable, number of professionals in this Application not included in a staffing plan approved by the client:	N/A
If applicable, difference between fees budgeted and compensation sought for the Application Period:	\$185,831.72
Number of professionals billing fewer than 15 hours to the case during the Application Period:	3
Are any timekeeper's hourly rates higher than those approved or disclosed at retention? If yes, calculate and disclose the total compensation sought in this Application using the rates originally disclosed in the retention application:	None.

agreement to reduce its fees by an amount equal to 20% of its hourly rates.

**SUMMARY OF PRIOR MONTHLY FEE STATEMENTS FOR THE COMPENSATION
PERIOD FROM APRIL 16, 2019 THROUGH AUGUST 31, 2020**

Date	Period Covered	Total Fees	20% Discount	Fees Requested (90%)	Holdback (10%)	Expenses Requested	Fees Paid	Expenses Paid
July 9, 2019	April 19, 2019- April 30, 2019	\$386,294.25	\$309,035.40	\$278,131.86	\$30,903.54	\$2,539.46	\$278,131.86	\$2,539.46
July 15, 2019	May 1, 2019- May 31, 2019	\$305,448.00	\$244,358.40	\$219,922.56	\$24,435.84	\$7,833.59	\$219,922.56	\$7,833.59
August 27, 2019	June 1, 2019-June 30, 2019	\$382,072.25	\$305,657.78	\$275,092.02	\$30,565.73	\$1,389.18	\$213,003.75	\$1,389.18
September 27, 2019	July 1, 2019- July 31, 2019	\$407,887.50	\$326,310.00	\$293,679.00	\$32,631.00	\$24,948.34	\$251,157.08	\$24,948.34
November 5, 2019	August 1, 2019- August 30, 2019	\$385,731.00	\$308,584.80	\$277,726.32	\$30,858.48	\$15,291.51	\$198,757.11	\$15,218.16
November 14, 2019	September 1, 2019 – September 30, 2019	\$553,257.25	\$442,605.80	\$398,345.22	\$44,260.58	\$1,973.24	\$207,078.94	\$1,942.64
January 10, 2020	October 1, 2019- October 31, 2019	\$606,059.25	\$484,847.40	\$436,362.66	\$48,484.74	\$7,695.88	\$236,682.26	\$4,153.17
March 2, 2020	November 1, 2019- November 30, 2019	\$418,140.50	\$334,512.40	\$301,061.16	\$33,451.24	\$7,321.13	\$215,445.16	\$7,233.83
March 2, 2020	December 1, 2019- December 31, 2019	\$263,706.75	\$210,965.54	\$189,868.86	\$21,096.68	\$9,617.26	\$138,657.53	\$8,191.43
March 12, 2020	January 1, 2020- January 31, 2020	\$206,881.25	\$165,505.00	\$148,954.50	\$16,550.50	\$8,662.68	\$83,963.47	\$8,662.68

June 18, 2020	February 1, 2020-February 29, 2020	\$238,539.50	\$190,831.16	\$171,748.44	\$19,082.72	\$7,346.58	\$168,535.89	\$7,346.58
August 6, 2020 ⁵	March 1, 2020-March 31, 2020	\$250,466.00	\$200,372.80	\$180,335.52	\$20,037.28	\$5,314.26	\$177,686.89	\$5,257.86
August 6, 2020	April 1, 2020-April 30, 2020	\$249,058.50	\$199,246.80	\$179,322.12	\$19,924.68	\$7,029.08	\$176,632.29	\$7,029.08
August 6, 2020	May 1, 2020- May 31, 2020	\$92,866.50	\$74,293.20	\$66,863.88	\$7,729.32	\$7,029.08	\$65,860.92	\$7,029.08
August 19, 2020	June 1, 2020-June 30, 2020	\$69,628.50	\$55,702.80	\$50,132.52	\$5,570.28	\$15,489.56	\$49,380.53	\$15,489.56
September 17, 2020	July 1, 2020-July 31, 2020	\$107,955.50	\$86,364.40	\$77,727.96	\$8,636.44	\$7,384.90	\$76,562.04	\$7,384.90
November 12, 2020	August 1, 2020-August 31, 2020	\$116,027.50	\$92,822.00	\$85,539.80	\$9,282.20	\$7,093.72	N/A	N/A

⁵ The August, 2020 invoice was submitted to the Committee for review and approval but as of the deadline for filing of this application has not yet been approved. In the event that the fees and expenses set forth herein for the months of August, 2020 is not approved in total, then GJB will file a supplemental Application accordingly.

Summary of Amounts Requested to be Paid

Total Unpaid Fees: \$208,180.54

Total Unpaid Expenses \$7,150.12

Total 10% Holdback on Fees: \$89,963.36

Reimbursement for 29% Tax Withholding: \$4,725.14

Reimbursement for 1.5% Government Contribution: \$10,891.96

Less expenses voluntarily reduced herein: N/A

Total Amount Requested to be Paid in Fees and Expenses for this period: \$215,330.66

PRIOR INTERIM FEE APPLICATIONS

First Interim Fee Application

Date Filed	DE#	Period Covered	Total Fees	20% Discount	Fees Requested (90%)	Holdback (10%)	Expenses Requested
7/15/19	7994	April 19, 2019- May 31, 2019	\$691,742.25	\$553,393.80	\$498,054.42	\$55,339.38	\$10,373.05

Second Interim Fee Application

Date Filed	DE#	Period Covered	Total Fees	20% Discount	Fees Requested (90%)	Holdback (10%)	Expenses Requested
11/15/19	9213	June 1, 2019- September 30, 2019	\$1,728,948.00	\$1,383,158.40	\$1,244,842.56	\$138,315.84	\$43,602.27

Third Interim Fee Application

Date Filed	DE#	Period Covered	Total Fees	20% Discount	Fees Requested (90%)	Holdback (10%)	Expenses Requested
3/15/20	12409	October 1, 2019- January 31, 2020	\$1,494,787.75	\$1,195,830.20	\$1,076,247.18	\$119,583.02	\$33,296.95

SUPPORTING CERTIFICATION, EXHIBITS, AND SCHEDULES

In accordance with the U.S. Trustee Guidelines, at the end of this Application are the following Exhibits and Schedules:

EXHIBIT A	CERTIFICATION OF JOHN H. GENOVESE IN SUPPORT OF APPLICATION
EXHIBIT B	CUSTOMARY AND COMPARABLE COMPENSATION DISCLOSURES
EXHIBIT C	SUMMARY OF TIMEKEEPERS INCLUDED IN THIS APPLICATION
EXHIBIT D	BUDGETS AND STAFFING PLANS FOR APPLICATION PERIOD
EXHIBIT E	SUMMARY OF COMPENSATION REQUESTED BY PROJECT CATEGORY
EXHIBIT E-1	SUMMARY OF COMPENSATION REQUESTED BY PROJECT CATEGORY AS COMPARED TO BUDGET
EXHIBIT E-2	SUMMARY OF EXPENSE REIMBURSEMENT REQUESTED BY CATEGORY
EXHIBIT F	BREAKDOWN OF COMPENSATION AND EXPENSE REIMBURSEMENT REQUESTED AND BY WHETHER SERVICES WERE RENDERED IN PUERTO RICO OR OUTSIDE PUERTO RICO
SCHEDULE 1	LIST OF PROFESSIONALS BY MATTER
SCHEDULE 2	MONTHLY STATEMENTS COVERED IN APPLICATION
SCHEDULE 3	PROPOSED ORDER

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**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

In re: **PROMESA**
Title III
THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO RICO, **No. 17 BK 3283-LTS**
as representative of **(Jointly Administered)**
THE COMMONWEALTH OF PUERTO RICO, et al.,
Debtors.⁶

**FOURTH INTERIM APPLICATION OF GENOVESE JOBLOVE & BATTISTA, P.A,
SPECIAL LITIGATION COUNSEL TO OFFICIAL COMMITTEE OF UNSECURED
CREDITORS, FOR ALLOWANCE OF COMPENSATION AND REIMBURSEMENT
OF EXPENSES FOR PERIOD FROM FEBRUARY 1, 2020 THROUGH
AUGUST 31, 2020**

To The Honorable United States District Judge Laura Taylor Swain:

Genovese Joblove & Battista, P.A. (“GJB”), special litigation counsel to the Official Committee of Unsecured Creditors (the “Committee”),⁷ in the above-captioned Title III cases (the

⁶ The Debtors in these Title III cases, along with each Debtor’s respective Title III case number and the last four (4) digits of each Debtor’s federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (the “Commonwealth”) (Bankruptcy Case No. 17-BK-3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation (“COFINA”) (Bankruptcy Case No. 17-BK-3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority (“HTA”) (Bankruptcy Case No. 17-BK-3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS”) (Bankruptcy Case No. 17-BK-3566-LTS) (Last Four Digits of Federal Tax ID: 9686); (v) Puerto Rico Electric Power Authority (“PREPA”) (Bankruptcy Case No. 17- BK-4780-LTS) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority (“PBA”) (Bankruptcy Case No. 19-BK-5233-LTS) (Last Four Digits of Federal Tax ID: 3801) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

⁷ Prior to August 25, 2017, the Committee was the Official Committee of Unsecured Creditors for the Commonwealth’s Title III case only. On August 25, 2017, the U.S. Trustee expanded the Committee’s role to also include the Title III cases of HTA, ERS, and PREPA.

“Title III Cases”) hereby submits its fourth interim fee application (the “Application”) for allowance of compensation for professional services rendered, and reimbursement for actual and necessary expenses incurred in connection with such services, for the period from February 1, 2020 through August 31, 2020 (the “Application Period”). GJB submits this Application pursuant to sections 316 and 317 of the Puerto Rico Oversight, Management and Economic Stability Act of 2016 (“PROMESA”),⁸ section 503(b) of Title 11, United States Code (the “Bankruptcy Code”) as made applicable to these cases by section 301(a) of PROMESA, Rule 2016 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), Rule 2016-1 of the Local Bankruptcy Rules for the United States Bankruptcy Court for the District of Puerto Rico (the “Local Rules”), *Appendix B of the United States Trustee Guidelines for Reviewing Applications for Compensation and Reimbursement of Expenses Filed under 11 U.S.C. § 330 by Attorneys in Larger Chapter 11 Cases* issued by the Executive Office for the United States Trustee, 28 CFR Part 58, Appendix B (the “Guidelines”), and in accordance with this Court’s the *First Amended Order Setting Procedures for Interim Compensation and Reimbursement of Expenses of Professionals* (“Interim Compensation Order”) [Docket No. 1715]; the *Second Amended Order Setting Procedures for Interim Compensation and Reimbursement of Expenses of Professionals* (“Second Interim Compensation Order”) [Docket No. 3269]; the Fee Examiner’s November 10, 2017 Memorandum (the “Fee Examiner Memorandum”); the Court’s *Order on Fee Examiner’s Motion to Impose Presumptive Standards and Timeliness requirements for Professional Fee Applications* (the “Presumptive Order”) [Docket No. 3932]; and the Court’s *Order Imposing Additional Presumptive Standards: Rate Increases and the Retention of Expert Witnesses or Other Sub-retained Professionals* (the “Revised Presumptive Order”) [Docket No. 7678]. In support of the Application, GJB submits the Certification of John H. Genovese

⁸ References to PROMESA are references to 48 U.S.C. §§ 2101 *et. seq.*

(the “Genovese Certification”), attached hereto as **Exhibit A**, and respectfully represents as follows:

Jurisdiction and Venue

1. The Court has subject matter jurisdiction to consider and determine this Fourth Interim Application pursuant to PROMESA section 306(a). Venue is proper before this Court pursuant to PROMESA section 307(a). The statutory predicates for the relief requested herein are PROMESA sections 316 and 317, Bankruptcy Rule 2016 and Local Rule 2016-1.

2. This Application has been prepared in accordance with the Guidelines and the Interim Compensation Order. Attached hereto as **Exhibit A** is a certification regarding compliance with the Local Guidelines.

3. This Application is consistent with the Interim Compensation Order (as defined below), Local Rule 2016-1, and *Appendix B of the United States Trustee’s Guidelines for Reviewing Applications for Compensation and Reimbursement of Expenses Filed Under 11 U.S.C. § 330 by Attorneys in Larger Chapter 11 Cases* (the “U.S. Trustee Guidelines”). To the extent necessary, GJB requests a waiver for cause shown of any requirements not met by this Application.⁹

BACKGROUND

A. Case Background

4. On May 3, 2017, the Oversight Board commenced a Title III case for the Commonwealth of Puerto Rico by filing a voluntary petition for relief pursuant to section 304(a) of PROMESA (the “Commonwealth Title III Case”). Thereafter, the Oversight Board commenced a Title III case for each of COFINA, the Employees Retirement System of the Government of the

⁹ The Committee and GJB reserve all rights as to the relevance and substantive legal effect of the U.S. Trustee Guidelines with respect to any application for compensation in these cases.

Commonwealth of Puerto Rico (the “ERS Title III Case”), the Puerto Rico Highways and Transportation Authority (the “HTA Title III Case”), and the Puerto Rico Electric Power Authority (the “PREPA Title III Case”) (and together with the Commonwealth Title III Case, the “Title III Cases”).¹⁰ By orders dated June 29, 2017 [Docket No. 537] and October 6, 2017 [Docket No. 1417], the Court approved the joint administration of the Title III Cases.

5. On June 15, 2017, the Office of the United States Trustee for the District of Puerto Rico (the “U.S. Trustee”) filed a *Notice Appointing Creditors Committee for Unsecured Creditors* [Docket No. 338]. Thereafter, on the U.S. Trustee modified the composition of the Committee membership [Docket Nos. 1171, 3058, and 3947], such that, currently, the members of the Committee are the American Federation of Teachers, Baxter Sales and Distribution Puerto Rico Corp., Doral Financial Corporation, Genesis Security Services, Inc., Service Employees International Union, Tradewinds Energy Barceloneta, LLC, and Unitech Engineering Group, S.E. (the “Committee Members”) [Docket No. 3947].

6. On August 25, 2017, the U.S. Trustee filed an *Amended Notice of Appointment of Official Committee of Unsecured Creditors* [Docket No. 1171], which expanded the role of the Committee to be the official committee for the HTA Title III Case, the ERS Title III Case, and the PREPA Title III Case.

B. Retention of Genovese Joblove & Battista, P.A.

7. On April 16, 2019, the Committee selected GJB as proposed special litigation counsel to the Committee in connection with the evaluation and analysis of potential causes of action and representation as co-plaintiff in the filing and prosecution of certain claims and causes of action to be asserted against certain parties involved in the offering of (a) the Commonwealth’s

¹⁰ Unless otherwise indicated, references to docket numbers shall be to the docket of the Commonwealth Title III Case.

General Obligation bonds (“GO Bonds”), (b) bonds issued by the Public Buildings Authority (“PBA”), and (c) bonds issued by ERS (“ERS”), including bond counsel, disclosure counsel, underwriters, underwriters’ counsel, swap counterparties, or auditors (collectively, the “Financial Party Targets”).

8. Upon its retention on April 16, 2019, and prior to entry of the *Stipulation and Agreed Order By and Among Financial Oversight and Management Board, Its Special Claims Committee, and Official Committee of Unsecured Creditors to Joint Prosecution of Debtor Causes of Action* [Doc No. 6524] (the “Joint Prosecution Stipulation”), GJB immediately started assisting the Committee with respect to the Committee’s motion to pursue certain causes of action on behalf of the Commonwealth, filed with the court on April 17, 2019 [Docket No. 6325] (the “926 Motion”), including the reply in further support of the 926 Motion, filed with the court on April 22, 2019 [Docket No. 6458]. Additionally, GJB evaluated and analyzed certain potential causes of actions against the Financial Party Targets in order to file the Co-Plaintiff Adversary Proceedings against such Financial Party Targets on or before the Commonwealth’s statute of limitation deadline or after expiration or termination of the Tolling Agreements with respect to such Financial Party Targets. These tasks required a great deal of work in a very short period of time due to the impending statute of limitations deadline of May 2, 2019.

9. The retention of a special litigation counsel was necessary and appropriate because the Committee’s primary counsel, Paul Hastings, LLP (“Paul Hastings”) represents certain of the Financial Party Targets (or their affiliates) in matters unrelated to the Title III Cases.

10. On April 26, 2019, the Court approved the Joint Prosecution Stipulation. In connection with the prosecution of such claims or causes of action, the Oversight Board agreed to the appointment of the members of the Special Claims Committee of the Oversight Board

(“Special Claims Committee”), on the one hand, and the Committee, on the other hand, as co-trustees and co-plaintiffs with respect to the Co-Plaintiff Adversary Proceedings.

11. As set forth in the Engagement Agreement dated April 30, 2019, GJB was retained by and authorized to represent the Committee as special litigation counsel and assist the Committee and the Special Claims Committee regarding investigation and pursuit of potential claims against certain Financial Party Targets.

12. On April 30, 2019, the Committee filed the *Application for Order Pursuant to Bankruptcy Code Section 1103(a) and Local Bankruptcy Rule 2014-1(e) Authorizing Employment and Retention of Genovese Joblove & Battista, P.A. as Special Litigation Counsel to Official Committee of Unsecured Creditors, Effective as of April 16, 2019* [Docket No. 6661] (the “GJB Employment Application”).

13. On May 31, 2019, the Court entered the *Order Authorizing Employment and Retention of Genovese, Joblove & Battista, P.A. as Special Litigation Counsel to Official Committee of Unsecured Creditors, Pursuant to Bankruptcy Code Section 1103(A) and Local Rule 2014-1(e), Effective as of April 16, 2019* [Docket No. 7181] (the “Retention Order”).

14. GJB’s retention extends to the representation of the Committee as the official committee for the HTA Title III Case, the ERS Title III Case, and the PREPA Title III Case. In particular, the Retention Order provided that “[t]he retention of GJB, as counsel to the Committee, shall be deemed to apply to the representation of the Committee if ever enlarged to include unsecured creditors of other debtors, without the need to obtain a modification of this Order.”

15. The Retention Order authorized GJB to be compensated on an hourly basis and reimbursed for actual and necessary out-of-pocket expenses pursuant to sections 316 and 317 of PROMESA, the Bankruptcy Rules, the Local Rules, and such orders as the Court may direct. The

Retention Order further provides that “[p]ursuant to Bankruptcy Code section 503(b)(1), made applicable by PROMESA section 301(a), the fees and expenses of GJB shall be an administrative expense.” In addition, as provided in the Retention Order, the Committee has consented to the Debtors’ payment of GJB’s allowed fees and expenses.

C. Interim Compensation and Fee Examiner Orders

16. On August 23, 2017, the Court entered the *Order Setting Procedures for Interim Compensation and Reimbursement of Expenses of Professionals* [Docket No. 1150].

17. On October 6, 2017, the Court appointed a Fee Examiner in these Title III Cases (the “Fee Examiner”) pursuant to the *Order Pursuant to PROMESA Sections 316 and 317 and Bankruptcy Code Section 105(a) Appointing a Fee Examiner and Related Relief* [Docket No. 1416] (the “Fee Examiner Order”). The Court appointed Brady Williamson as the Fee Examiner in the Title III Cases.

18. On October 31, 2017, the Fee Examiner filed the *Urgent Motion of the Fee Examiner to Amend the Interim Compensation Order, Including the Due Date and Hearing Date for Interim Compensation* [Docket No. 1594].

19. On November 8, 2017, the Court entered the *First Amended Order Setting Procedures for Interim Compensation and Reimbursement of Expenses of Professionals* [Docket No. 1715].

20. On November 10, 2017, the Fee Examiner issued a memorandum, and on January 3, 2018, the Fee Examiner issued a supplemental memorandum (together, the “Fee Examiner Guidelines”) to all retained professionals in these Title III Cases providing additional guidelines in connection with the Interim Compensation Order.

21. On May 8, 2018, the Fee Examiner filed the *Motion of the Fee Examiner to Amend the Fee Examiner Order with Respect to the Scope of the Fee Examiner's Authority in the Interest of Administrative Efficiency* [Docket No. 3032] (the "Motion to Amend the Fee Examiner Order").

22. On May 23, 2018, the Oversight Board and the Puerto Rico Fiscal Agency and Financial Authority ("AAFAF") filed a *Joint Motion for Entry of an Order Further Amending the Interim Compensation Order* [Docket No. 3133].

23. On June 6, 2018, the Court entered the Interim Compensation Order [Doc. No. 3269], and in accordance therewith, GJB and other professionals retained in these Title III Cases were authorized to serve upon the parties identified therein (the "Notice Parties") monthly fee statements (the "Monthly Fee Statements").

24. Pursuant to the Interim Compensation Order, the Notice Parties have ten (10) days from the date of service of the Monthly Fee Statement to object to the amounts requested. If no objection is filed prior to expiration of the objection period, the Commonwealth is authorized to pay the respective professionals 90% of the fees and 100% of the expenses sought in each Monthly Fee Statement.

25. On June 20, 2018, the Court entered the *First Amended Order Pursuant to PROMESA Sections 316 and 317 and Bankruptcy Code Section 105(A) Appointing a Fee Examiner and Related Relief* [Docket No. 3324] (the "Amended Fee Examiner Order").

26. On June 26, 2019, the Court entered the *Order Imposing Additional Standards: Rate Increases and the Retention of Expert Witnesses or Other Sub-Retained Professionals* [Docket No. 7678].

D. Applications for Interim Compensation

27. In addition to the Monthly Fee Statements, the Interim Compensation Order directed professionals to seek interim allowance and payment of compensation (including the 10% held back from Monthly Fee Statements) and expense reimbursement at 120-day intervals (each an “Interim Fee Period”) by filing with the Court and serving on the Notice Parties an application for approval and allowance of all compensation and reimbursement of expenses relating to services rendered and expenses incurred during the preceding Interim Fee Period (*see* Interim Compensation Order at ¶2(f)).

28. On July 15, 2019, GJB filed its First Interim Fee Application for the period from April 16, 2019 through May 31, 2019 [ECF No. 7994] (the “First Interim Fee Application”). The hearing on the First Interim Fee Application was held on October 30, 2019 at 9:30 a.m.

29. On October 29, 2019, the Court entered the *Omnibus Order Awarding Interim Allowance of Compensation for Professional Services Rendered and Reimbursement of Expenses for the Sixth Compensation Period from February 1, 2019 through May 31, 2019* [ECF No. 9046] (the “First Interim Fee Order”). Pursuant to the First Interim Fee Order, GJB was awarded \$657,907.05 in fees and \$3,848.56 in expenses.

30. On November 15, 2019, GJB filed its Second Interim Fee Application for the period from June 1, 2019 through September 30, 2019 [ECF No. 9213] (the “Second Interim Fee Application”). The hearing on the First Interim Fee Application was held on March 4, 2020 at 9:30 a.m. and was continued to April 22, 2020 at 9:30 a.m.

31. On June 1, 2020, the Court entered the *Second Supplemental Omnibus Order Awarding Interim Allowance of Compensation for Professional Services Rendered and Reimbursement of Expenses for the Seventh Interim (June 1- September 30, 2019) and Prior*

Compensation Periods [ECF No. 13296] (the “Second Interim Fee Order”). Pursuant to the Second Interim Fee Order, GJB was awarded \$1,339,434.84 in fees and \$43,602.27 in expenses.

32. On March 16, 2020, GJB filed its Third Interim Fee Application for the period from October 1, 2019- January 31, 2020 [ECF No. 12409] (the “Third Interim Fee Application”). The hearing on the Third Interim Fee Application is scheduled for July 29, 2020 at 9:30 a.m. [ECF No. 12410].

33. On July 24, 2020, the Court entered the *Omnibus Order Awarding: I. Interim Allowance of Compensation for Professional Services Rendered and Reimbursement of Expenses for the Eighth Interim (October 1, 2019-January 31, 2020) and Prior Compensation Periods; II. Final Allowance of Compensation for Professional Services Rendered and Reimbursement of Expenses for the Final Fee Period* [ECF No. 13824] (the “Third Interim Fee Order”). Pursuant to the Third Interim Fee Order, GJB was awarded \$1,171,906.40 in fees and \$33,296.95 in expenses.

COMPENSATION AND REIMBURSEMENT REQUEST

34. By this Application, GJB seeks an order authorizing (a) allowance of interim compensation for professional services rendered to the Committee during the Application Period in the aggregate amount of \$1,124,542.00 and (b) allowance of reimbursement of actual and necessary expenses incurred by GJB in the aggregate amount of \$56,534.33. These amounts were for legal services provided to the Committee in connection with the Commonwealth Title III case.

35. During the Application Period, GJB attorneys and paraprofessionals expended a total of 2,587.90 hours for which compensation is requested. All services rendered and expenses incurred for which compensation or reimbursement is requested were performed or incurred for or on behalf of the Committee.

36. The Committee has approved the amounts requested by GJB for services performed

and expenses incurred in each of the monthly statements submitted to the Notice Parties as outlined in the Interim Compensation Order with the exception of the August, 2020 Fee Statements which are under review.

37. During the Application Period, GJB submitted seven (7) Monthly Fee Statements. The first Monthly Fee Statement for the period from February 1, 2020 through February 29, 2020 was submitted and served on the Notice Parties on June 18, 2020 (the “First Monthly Fee Statement”) a copy of which is attached hereto as Schedule 2. The objection deadline for the First Monthly Fee Statement was June 29, 2020.

38. A second Monthly Fee Statement for the period from March 1, 2020 through March 31, 2020 was submitted and served on the Notice Parties on August 6, 2020 (the “Second Monthly Fee Statement”) a copy of which is attached hereto as Schedule 2. The objection deadline for the Second Monthly Fee Statement was August 17, 2020.

39. A third Monthly Fee Statement for the period from April 1, 2020 through April 30, 2020 was submitted and served on the Notice Parties on August 6, 2020 (the “Third Monthly Fee Statement”) a copy of which is attached hereto as Schedule 2. The objection deadline for the Third Monthly Fee Statement was August 17, 2020.

40. A fourth Monthly Fee Statement for the period from May 1, 2020 through May 31, 2020 (the “Fourth Monthly Fee Statement”), was submitted to the Committee, on August 6, 2020, a copy of which is attached hereto as Schedule 2. The objection deadline for the Third Monthly Fee Statement was August 17, 2020.

41. A fifth Monthly Fee Statement for the period from June 1, 2020 through June 30, 2020 (the “Fifth Monthly Fee Statement”), was submitted to the Committee, on August 19, 2020 a copy of which is attached hereto as Schedule 2. The objection deadline for the Third Monthly Fee Statement was August 31, 2020.

42. A sixth Monthly Fee Statement for the period from July 1, 2020 through July 30, 2020 (the “Sixth Monthly Fee Statement”), was submitted to the Committee, on September 17, 2020, a copy of which is attached hereto as Schedule 2. The objection deadline for the Third Monthly Fee Statement was September 28, 2020.

43. A seventh Monthly Fee Statement for the period from August 1, 2020 through August 31, 2020 (the “Seventh Monthly Fee Statement”), was submitted to the Committee, on November 12, 2020, a copy of which is attached hereto as Schedule 2. The objection deadline for the Seventh Monthly Fee Statement is November 23, 2020.

44. As of the date of the filing of this Application, GJB has received neither payment nor promises of payment from any source for services rendered during the Application Period. The amount of \$208,180.54 remains unpaid.

45. As a courtesy to the Committee and based on circumstances unique to the Title III Case, during the Application Period GJB voluntarily applied a 20% discount of its hourly rates totaling \$224,908.40. For details regarding the waived fees, please see the Certification of John H. Genovese filed concurrently herewith.

46. By this Application, GJB requests allowance of all fees and expenses incurred for services rendered during the Application Period. At this time, GJB seeks payment of (a) 100% of its fees for services invoiced during the Application Period and (b) 100% of expenses invoiced during the Application Period. The time billed by these timekeepers was reasonable, and GJB reserves the right to seek allowance and payment of these fees based on the facts and circumstances of these cases, including, without limitation, if objections are interposed to the allowance or payment of GJB’s fees and expenses.

47. There is no agreement or understanding between GJB and any other person other

than the attorneys, employees, and staff of GJB, for the sharing of compensation to be received for services rendered in these cases.

48. GJB maintains computerized records, in the form of monthly statements, of the time spent by all GJB's attorneys and paraprofessionals in connection with its representation of the Committee. The monthly statements are in the same form regularly used by GJB to bill its clients for services rendered and include the date that the services were rendered, a detailed, contemporaneous narrative description of the services provided, the amount of time spent for each service, and the designation of the professional who performed the service.

49. The fees charged by GJB in the Title III Case are billed in accordance with its existing billing rates and procedures in effect during the Application Period. The rates GJB charges for the services rendered by its professionals and paraprofessionals in the Title III Case are comparable to the rates GJB charges for professional and paraprofessional services rendered in comparable non-bankruptcy related matters.

50. GJB's rates are set at a level designed to fairly compensate GJB for the work of its attorneys and paraprofessionals to cover fixed and routine overhead expenses. GJB operates in a national marketplace for legal services in which rates are driven by multiple factors relating to the individual lawyer, his or her area of specialization, the firm's expertise, performance and reputation, the nature of the work involved, and other factors. Accordingly, GJB set its rates for attorneys and paraprofessionals both in the restructuring group and other practice groups within the firm by reference to market information and market adjustments by firms considered to be industry peers. Based on this and reviews of contemporaneous time records and fee applications filed in other cases, GJB's endeavors to set the hourly rates for its attorneys and paraprofessionals at levels comparable to those of its principal competitor firms.

51. As is customary, and as permitted pursuant to paragraph 2 of the Retention Order, every year GJB reviews its rate structure and, when appropriate, adjusts its hourly rates based upon (i) the advancing seniority of its professionals and paraprofessionals, (ii) the current market for legal services, (iii) the rates charged for comparable non-bankruptcy services, and (iv) the firm's analysis of the hourly rates being charged by professionals in other law firms.

52. GJB's professional services during the Application Period required an aggregate expenditure of 2,587.90 recorded hours by GJB's attorneys and paraprofessionals, broken down as follows: partners (1,290.00 hours), associates (701.20 hours), and paraprofessionals (691.10 hours). During the Application Period, GJB's billing rates for attorneys rendering services in this matter ranged from \$300.00 to \$765.00 per hour. No rate increases were made in January 2020 for the incoming year.

53. To the extent that time or disbursement charges for services rendered or disbursements incurred relate to the Application Period, but were not processed before the preparation of this Application, or GJB has for any other reason not sought compensation or reimbursement with respect to such services or expenses, GJB reserves the right to request additional compensation for such services, and reimbursement of such expenses, in a supplemental or future application.

54. Pursuant to, and consistent with, the relevant requirements of the Guidelines, as applicable, the following exhibits are attached hereto and incorporated herein by reference:

- Exhibit A- Certification of John H. Genovese
- Exhibit B- contains disclosures regarding "customary and comparable compensation."
- Exhibit C contains a summary of GJB's timekeepers included in this Application.

- Exhibit D contains the budgets for GJB's services during the Application Period.
- Exhibit E contains (a) a summary of the compensation requested as compared to the compensation budgeted for the firm's services during the Application Period, and (b) a further breakdown of the compensation requested by project category and matter number.
- Exhibit E-1 contains summary of compensation requested by project category as compared to budget.
- Exhibit E-2 contains a summary of the expense reimbursements requested by category. An itemized schedule of all such expenses is included in GJB's monthly statements.
- Exhibit F contains a breakdown of compensation and expense reimbursement requested by Debtors and by whether the services were rendered in Puerto Rico or outside Puerto Rico.
- Schedule 1 contains a list of the professionals providing Services during the Application Period by matter.
- Schedule 2 includes the monthly fee statements covered in this Application.
- Schedule 3 includes the proposed order approving this Application.

**SUMMARY OF SERVICES PERFORMED BY GJB DURING
THE APPLICATION PERIOD**

55. This Application is GJB's fourth interim compensation in the Debtors Title III Cases. As with the prior fee period, during this Application Period, GJB has assisted and advised the Committee on a regular basis regarding legal matters related to the Co-Plaintiff Adversary Proceedings. GJB has continued to track deadlines, organized documents, and review the Title III Case dockets to maintain its litigation tracking spreadsheets current. In addition, GJB has reviewed various motions, applications, scheduling orders and other pleadings submitted to the

Court in connection with the pending Co-Plaintiff Adversary Proceedings. Specifically, GJB has continued to monitor the progress of a number of adversary proceedings, and advise the Committee as appropriate, including without limitation, those adversary proceedings against underwriters and other financial target parties involved in the issuance of Commonwealth bonds and claims of PREPA against fuel oil suppliers and laboratories to avoid certain fraudulent transfers. Also, GJB has continued its representation of the Committee with respect to limited “garden-variety” avoidance actions against entities that received preferential and fraudulent transfers before the petition date. Furthermore, GJB has been involved in the representation of the Committee in a subset of adversary proceedings seeking to recover, among other things, declaratory judgments that the pertinent challenged GO bonds were issued in violation of the Constitution of Puerto Rico and to recover fraudulent transfers made on account of GO bonds that were not validly issued. GJB has continued working on the adversary proceedings challenging liens asserted by certain holders of HTA bonds. GJB also continued its representation of the Committee in connection with the ERS litigation which is seeking, among other things, declarations on the scope of the liens purportedly securing the ERS bonds and ultra vires objection. Lastly, during this Application Period, GJB provided counsel and assistance with other issues related to the Committee’s motion to participate in the GO Bond Claim Objections (and related mediation process) and the impact of PREPA’s restructuring support agreement (the “PREPA RSA Motion”). Additionally, GJB has monitored and reviewed the proposed plan of adjustment [Docket No. 8765] (the “Initial Plan”) and Disclosure Statement [Docket No. 8766] (the “Disclosure Statement”) filed on September 27, 2019 to consider its impact on pending litigation, as well as GJB undertook tasks in which Paul Hastings had specific conflicts.

56. Set forth below is a description of the professional services rendered by GJB during the Application Period broken down by project category. The following services described are not

intended to be a comprehensive summary of the work performed by GJB. Detailed descriptions of all services rendered by GJB can be found in the detailed time records reflecting the services performed by GJB's professionals, the time expended by each professional, and the hourly rate of each professional, annexed to the Monthly Fee Statements attached hereto as Schedule 2 and such descriptions are incorporated herein by reference.

57. As special litigation and conflicts counsel to the Committee, GJB has jointly worked on various matters with counsel for the Oversight Board or its Special Claims Committee and has made a concerted effort to perform these services in an economic, effective, and efficient manner commensurate with the complexity and importance of the issues involved while being mindful to avoid any unnecessary or unreasonable duplication of effort with respect to any incurrence of fees in connection with the adversary proceedings commenced under the Joint Prosecution Stipulation. As such, GJB has carefully reviewed its staffing needs on a monthly basis and taken affirmative steps to avoid charges for duplicative services. For example, the work performed by GJB was carefully assigned to appropriate professionals or paraprofessionals according to the experience and level of expertise required for each particular task. Moreover, whenever possible, GJB sought to minimize the costs of GJB's services to the Committee by utilizing talented junior attorneys and paraprofessionals to handle the more routine aspects of the assignments. In addition, a small group of the same GJB attorneys was utilized for the vast majority of the work in these Title III cases to minimize the costs of intra-GJB communication and education about the cases. Notably, as a general matter, no more than two GJB attorneys attended the various hearings held during the Application Period, thereby minimizing not only the time billed on these hearings but also the cost of travel and lodging.

58. Furthermore, to the extent appropriate, GJB sought to work closely with Paul Hastings as counsel for the Committee and Brown Rudnick LLP ("Brown Rudnick" or "Special

Claims Committee Counsel”) as counsel for the Financial Oversight and Management Board, acting through its Special Claims Committee (the “Oversight Board”) in order to eliminate unnecessary duplication and allocate tasks in an efficient manner. In order to minimize duplication, GJB continues to meet with and confer with Special Claims Committee Counsel to discuss pending and potential claims and discuss a division of labor and tasks to limit duplication.

59. In sum, GJB respectfully submits that the services for which it seeks compensation in this Application were necessary for and beneficial to the Committee, and were rendered to protect, preserve, and maximize the value for unsecured creditors during the pendency of these Title III cases. Accordingly, in light of the nature and complexity of these Title III cases, GJB’s charges for professional services performed and expenses incurred are reasonable under applicable standards. For all these reasons, GJB respectfully requests that the Court grant the Application and allow interim compensation for professional services performed and reimbursement for expenses as requested.

60. For ease of reference and transparency purposes, GJB created several matter numbers for its representation of the Committee. The matter numbers are divided as follows:

Matter ID	Matter Name
001	Official Committee of Unsecured Creditors
002	PREPA Adversary Litigation
003	ERS Adversary Litigation
004	HTA Adversary Litigation
005	Kobre & Kim Report Database Doc. Review

Official Committee of Unsecured Creditors of Commonwealth of Puerto Rico (Matter ID 001)

(a) Case Administration (Task Code B110)

Fees: \$30,553.00 Total Hours: 114.30

61. During the Application Period, GJB reviewed and developed general case strategy

and planning of litigation matters, attended to case management, and participated in meetings with Paul Hastings and Brown Rudnick. In order to efficiently track deadlines, organize documents, and manage work streams, GJB created a task list and tracking chart for all adversary proceedings filed which it routinely updates to keep track of deadlines. In addition, during the Application Period, GJB held internal team conference calls and occasional meetings to discuss interim and long-term strategies regarding the Co-Plaintiff Adversary Proceedings and to manage the work assignments and deadlines, while ensuring efficiencies and avoiding duplication and unnecessary overlap.

(b) Pleadings Review (Task Code B113)

Fees: \$97,999.50 Total Hours: 472.50

62. During the Application Period, GJB periodically monitored the docket and reviewed and analyzed pleadings and filings in the Title III cases pertaining to those matters that impacted the Co-Plaintiff Adversary Proceedings and prepared summaries of pleadings filed and orders entered for internal review. Further, GJB reviewed relevant pleadings filed related to the Co-Plaintiff Adversary Proceedings it is handling as special litigation counsel to the Committee.

(c) Meeting of Creditors (Task Code B150)

Fees: \$8,433.00 Total Hours: 14.60

63. During the Application Period, GJB attended telephone conferences, and weekly meetings, and other communications with the Committee, including preparation for such calls and meetings in order to maintain the Committee informed of the various developments in the Co-Plaintiff proceedings being handled by GJB.

(d) Court Hearings (Task Code B155)

Fees: \$1,803.00 Total Hours: 3.40¹¹

¹¹ The description of services in this Application is limited to those matters in which Genovese Joblove & Battista, P.A. provided five (5) or more hours of service during the Application Period.

(e) Fee/Employment Applications (GJB) (Task Code B160)

Fees: \$30,664.00

Total Hours: 82.10

64. During the Application Period, GJB prepared seven (7) monthly fee statements for services rendered during the months of February, March, April, May, June, July and August, 2020 as well as responding to inquiries from the Fee Examiner. GJB also prepared and filed the Third Interim Fee Application and related exhibits [Doc No. 12409] and begin preparation of the Fourth Interim Fee Application.

(f) Budgeting (Task Code B161)

Fees: \$14,353.50

Total Hours: 24.50

65. During the Application Period, GJB reviewed Budget and staffing issues and procedures in connection with the preparation, submission and approval of same. GJB prepared monthly budgets for February, March, April, May, June, July, August and September 2020, as required by the Fee Examiner and Interim Fee Orders.

(g) Fee/Employment Applications for Other Professionals (Task Code B165)

Fees: \$460.00

Total Hours: 0.80

(h) Fee/Employment Objections (Task Code B170)

Fees: \$4,197.50

Total Hours: 7.30

66. During the Application Period GJB reviewed and analyzed correspondence from the Fee Examiner and reviewed e-mail and comments from Nicholas Hahn with regarding to GJB's Second Interim Fee Application.

(i) Other Contested Matters (Task Code B190)

Fees: \$4,732.50

Total Hours: 9.90

67. During the Application Period, GJB's analyzed and monitored motions to dismiss filed by certain GO bondholder groups and the Lawful Constitutional Debt Coalition in response

to omnibus objections. Additionally, GJB prepared global spreadsheet reviewing and synthesizing causes of action handled by GJB. GJB, reviewed the Motion to Extend Deadlines and Establish Litigation Case Management and reviewed opposition to UCC 2019 Motion regarding Disclosure 2019.

(j) General Litigation (Task Code B191)
Fees: \$747,263.50 Total Hours: 1,464.70

68. During this Application Period, GJB has continued its representation as special litigation and conflicts counsel to the Committee in connection with various adversary proceedings, including without limitation, two (2) separate adversary proceedings against: (a) numerous underwriters and other financial target parties involved in the issuance of Commonwealth bonds [Adv. Proc. No. 19-280-LTS]; and (b) the claims of PREPA against fuel oil suppliers and laboratories to avoid certain fraudulent transfers [Adv. Pro. No. 19-388-LTS]. Additionally, GJB is involved in the evaluation and if warranted, litigation of, a lawsuit filed by certain monoline insurers to assert claims against the same defendants sued by the Committee in Adv. Proc. No. 19-280-LTS, which monoline suit has been removed to the PROMESA proceedings. GJB also represents the Committee with respect to limited “garden-variety” avoidance actions [Adv. Proc. Nos. 19-267, 19-275-279] against entities that received preferential and fraudulent transfers before the petition date. In connection with the foregoing, GJB has been working with Committee and Special Claims Committee counsel and monitoring the establishment and extension of Case Management Procedures and Approval of Settlements related to those litigation matters it is handling. GJB has also provided, from time-to-time, additional assistance to Committee counsel with respect to litigation matters within GJB’s subject matter expertise, but in no way duplicative of the work performed by other counsel on these matters. Furthermore, GJB has been involved in the representation of the Committee in a subset of adversary proceedings

seeking to recover, among other things, declaratory judgments that the pertinent challenged GO bonds were issued in violation of the Constitution of Puerto Rico and to recover fraudulent transfers made on account of GO bonds that were not validly issued [Adv. Proc. No. 19-281, Adv. Proc. No. 19-282, Adv. Proc. No. 19-283, and Adv. Proc. No. 19-288] and a proceeding challenging liens asserted by certain holders of HTA bonds [Adv. Proc. No. 19-364]. GJB also continued its representation of the Committee in connection with the ERS litigation which is seeking, among other things, declarations on the scope of the liens purportedly securing the ERS bonds Adv. Proc. No. 19-367 and *ultra vires* objection.

(k) Debtors' Fiscal Plan (Task Code B210)

Fees: \$7,065.00 Total Hours: 14.10

69. During the Application Period, GJB researched plan objection issues and potential appellate remedies.

(l) Plan and Disclosure Statement (Task Code B320)

Fees: \$49,244.50 Total Hours: 91.00

70. During this Application Period, GJB provided assistance with issues related to the Initial Plan and Disclosure Statement and Amended Plan and Disclosure Statement and its impact on the pending Co-Plaintiff Adversary litigation.

(j) Restructurings (Task Code B420)

Fees: \$1,150.00 Total Hours: 2.00

V. PREPA (Matter ID 002)

(a) Case Administration (Task Code B110)

Fees: \$1,794.50 Total Hours: 5.50

71. During the Application Period, GJB continued to monitor the case and review

pleadings and deadlines associated with the PREPA RSA Motion, orders, hearings, and objections thereto. Additionally, GJB, reviewed pending tolling agreement deadlines.

- (b) Pleadings Review (Task Code B113)
Fees: \$406.50 Total Hours: 1.50
- (c) Meeting of Creditors (Task Code B150)
Fees: \$805.00 Total Hours: 1.40
- (d) Court Hearings (Task Code B155)
Fees: \$57.50 Total Hours: 0.10
- (e) Budgeting (Task Code B161)
Fees: \$2,070.00 Total Hours: 3.60
- (f) Other Contested Matters (Task Code B190)
Fees: \$6,323.00 Total Hours: 12.00

72. During the Application Period, GJB assisted with various litigation matters related to the PREPA RSA and PREPA 9019 Motion. In connection with the RSA and 9019 motion, GJB reviewed the reply to the Motion in Limine, the Tenth Revised Order Modifying Certain Deadlines Applicable to the 9019 Motion, reviewed the revised scheduling order, reviewed objections to Exhibit List and various matters involving the 9019 motion.

- (g) General Litigation (Task Code B191)
Fees: \$62,537.50 Total Hours: 132.00

73. During the Application Period, GJB reviewed and analyzed draft litigation and expert materials relating to PREPA RSA and 9019 Motion. GJB also was involved in pursuing the claims of PREPA against fuel oil suppliers and laboratories to avoid certain fraudulent transfers [Adv. Pro. No. 19-388-LTS]. Additionally, GJB was in contact with the SEC and VITOL defendants regarding the above referenced cases. GJB reviewed and analyzed the motion to stay the adversary proceedings and corresponding pleadings.

- (h) Debtors' Fiscal Plan (Task Code B210)

Fees: \$172.50 Total Hours: 0.30

(i) Meetings of and Communications with Board (Task Code B260)

Fees: \$172.50 Total Hours: 0.30

(j) Plan and Disclosure Statement (Task Code B320)

Fees: \$230.00 Total Hours: 0.40

V. ERS (Matter ID 003)

(a) Case Administration (Task Code B110)

Fees: \$210.00 Total Hours: 0.60

(b) Other Contested Matters (Task Code B190)

Fees: \$472.50 Total Hours: 0.90

(c) General Litigation (Task Code B191)

Fees: \$41,505.50 Total Hours: 102.30

74. During the Application Period, GJB continued its work representing the Committee in connection with the ERS Bond adversaries [Adv. Proc. No. 19-366 and Adv. Proc. No. 19-367]. GJB represents the Committee with respect to count I of the recovery actions and has been handling the *ultra vires* issues as they relate to count I of the recovery actions and scheduling orders regarding discovery and summary judgment briefing on the lien scope issues and *ultra vires* issues. Additionally, GJB has tracked the Committee's omnibus objection to the claims of ERS bondholders, discovery and summary judgment briefing on the lien scope and *ultra vires* issues with respect to the ERS bonds, as well as lift stay issues to the extent they impact the ERS Bond litigation.

75. Additionally, GJB has reviewed and analyzed motions regarding briefing and litigation schedules; pending discovery and pleadings related to the bonds issued by ERS. GJB has also spent time reviewing and calendaring deadlines and hearings related to the ERS litigation.

(d) Meetings and Communications with Board (Task Code B260)

Fees: \$112.50 Total Hours: 0.30

(e) Plan and Disclosure Statement (Task Code B320)

Fees: \$115.00 Total Hours: 0.20

VI. HTA (Matter ID 004)

(a) Case Administration (Task Code B110)

Fees: \$156.00 Total Hours: 0.80

(b) General Litigation (Task Code B191)

Fees: \$4,997.50 Total Hours: 16.70

76. During the Application Period, GJB paralegals prepared, reviewed and analyzed adversary complaints, prepared summons, service and case management orders. GJB prepared and reviewed motions and joinders regarding lift of stay; reviewed case management order for revenue bonds and various adversary proceedings, reviewed motion to intervene in HTA complaint; reviewed various pleadings in pending litigation. GJB has been involved and continued to monitor adversary proceeding challenging liens asserted by certain holders of HTA bonds [Adv. Proc. No. 19-364].

77. Additionally, GJB reviewed FOMB motion, reviewed AMBAC reply, motions for leave and pending miscellaneous litigation matters.

VI. Kobre & Kim Report Database Doc Review (Matter ID 005)- N/A

78. During the Application Period there was no time billed in this matter.

ATTENDANCE AT HEARINGS

79. In accordance with the presumptions set forth in the *Order on Fee Examiner's Motion to Impose Presumptive Standards and Timeliness Requirements for Professional Fee Applications* [Docket No. 3932] (the "Presumptive Standards Order"), GJB provides that there was

no travel and attendance of GJB's professionals at Court hearings during this Application Period.

ACTUAL AND NECESSARY DISBURSEMENTS

80. As set forth in Exhibit D-2 hereto, GJB disbursed \$56,687.18 as expenses incurred in providing professional services during the Application Period.

81. The time constraints imposed by the circumstances of the matters handled by GJB during the Application Period required its attorneys and other employees, at times, to devote substantial time during the evenings and on weekends to perform legal services on behalf of the Committee. These extraordinary services were essential to meet deadlines, timely respond to inquiries on a daily basis, and satisfy the Committee's needs and demands. Attorneys and other GJB employees who worked late in the evenings or on weekends were reimbursed for their reasonable meal and transportation costs in accordance with the Local Rules and firm policy. GJB's regular practice is not to include components for those charges in overhead when establishing billing rates, but rather to charge its clients for these and all other out-of-pocket disbursements incurred during the regular course of the provision of legal services.

82. GJB believes the rates for charges incurred are the market rates that the majority of law firms charge clients for such services. In addition, GJB believes that such charges are in accordance with the American Bar Association's ("ABA") guidelines, as set forth in the ABA's Statement of Principles, dated January 12, 1995, regarding billing for disbursements and other charges.

REQUESTED COMPENSATION SHOULD BE ALLOWED

83. Section 316 of PROMESA provides for the compensation of professionals. Specifically, section 316 provides that a court may award a professional employed by a committee under section 1103 of the Bankruptcy Code "reasonable compensation for actual, necessary

services rendered . . . and reimbursement for actual, necessary expenses.” PROMESA

§ 316(a). Section 316 also sets forth the criteria for the award of such compensation and reimbursement:

- (a) In determining the amount of reasonable compensation to be awarded to a professional person, the court shall consider the nature, the extent, and the value of such services, taking into account all relevant factors, including:
 - (i) the time spent on such services;
 - (ii) the rates charged for such services;
 - (iii) whether the services were necessary to the administration of, or beneficial at the time at which the service was rendered toward the completion of, a case under this chapter;
 - (iv) whether the services were performed within a reasonable amount of time commensurate with the complexity, importance, and nature of the problem, issue, or task addressed;
 - (v) with respect to a professional person, whether the person is board certified or otherwise has demonstrated skill and experience in the restructuring field; and
 - (vi) whether the compensation is reasonable based on the customary compensation charged by comparably skilled practitioners in cases other than cases under this title or title 11, United States Code.

PROMESA § 316(c). Further, section 317 of PROMESA provides that “a committee . . . may apply to the court not more than once every 120 days . . . for such compensation for services rendered”

84. In the instant case, GJB respectfully submits that the services for which it seeks compensation in this Application were, at the time rendered, believed to be necessary for and beneficial to the Committee, the Debtors, and their stakeholders and were rendered to protect,

preserve, and maximize value for unsecured creditors during the pendency of the Title III Cases. The services rendered to the Committee were performed in an economic, effective, and efficient manner commensurate with the complexity and importance of the issues involved. The results obtained to date have benefited not only the Committee but also the Debtors, their stakeholders, and other interested parties. Accordingly, the compensation requested herein is reasonable in light of the nature, extent, and value of such services to the Committee, the Debtors, and all parties in interest.

85. The work conducted was carefully assigned to appropriate professionals or paraprofessionals according to the experience and level of expertise required for each particular task. Whenever possible, GJB sought to minimize the costs of GJB's services to the Committee by utilizing talented junior attorneys and paraprofessionals to handle the more routine aspects of the assignments. A small group of the same GJB attorneys was utilized for the vast majority of the work in order to minimize the costs of intra-GJB communication and education about the Title III Cases. As demonstrated by this Application, GJB spent its time economically and without unnecessary duplication. Accordingly, approval of the compensation sought herein is warranted.

NOTICE

86. In accordance with the Interim Compensation Order, GJB will provide notice of this Application to (i) the attorneys for the Oversight Board, Proskauer Rose LLP and O'Neill & Borges LLC; (ii) the attorneys for the Puerto Rico Fiscal Agency and Financial Advisory Authority, O'Melveny & Myers LLP and Marini Pietrantonio Muñiz LLC; (iii) the Office of the United States Trustee for the District of Puerto Rico; (iv) the attorneys for the Official Committee of Retired Employees, Jenner & Block LLP and Bennazar, García & Milián, C.S.P.; (v) the Puerto Rico Department of Treasury; (vi) the Fee Examiner, Brady Williamson; and (vii) counsel to the

Fee Examiner, Godfrey & Kahn, S.C. and EDGE Legal Strategies, PSC. In addition, the notice of hearing with respect to this Application will be served on all parties that have filed a notice of appearance in the Title III Cases.

CONCLUSION

WHEREFORE, GJB respectfully requests entry of an order, substantially in the form attached hereto as Schedule 3, (i) allowing interim compensation for professional services rendered during the Application Period in the amount of \$1,124,542.00, representing 100% of the fees billed during the Application Period (after taking into account the 20% reduction of fees in the amount of \$899,633.60 and reimbursement of \$56,687.18, representing 100% of the actual and necessary expenses incurred during the Application Period (ii) authorizing and directing the Debtors' payment of the fees allowed (net of credits for fee reductions) plus 100% of the expenses allowed and any amounts paid by the Debtors pursuant to the Interim Compensation Order, (iii) allowing such compensation and payment for professional services rendered and reimbursement of actual and necessary expenses incurred be without prejudice to GJB's right to seek such further compensation and/or payment for the full value of services performed and expenses incurred, and (iv) granting GJB such other and further relief as is just.

Dated: November 16, 2020.

/s/ John H. Genovese

GENOVESE JOBLOVE & BATTISTA, P.A.

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**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

In re:

**THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO RICO,**

as representative of

THE COMMONWEALTH OF PUERTO RICO, *et al.*,

Debtors.¹

**PROMESA
Title III**

No. 17 BK 3283-LTS

(Jointly Administered)

**CERTIFICATION OF JOHN H. GENOVESE, ESQ. IN SUPPORT OF FOURTH
INTERIM FEE APPLICATION OF GENOVESE JOBLOVE & BATTISTA, P.A., AS
SPECIAL LITIGATION COUNSEL TO OFFICIAL COMMITTEE OF UNSECURED
CREDITORS, FOR SERVICES RENDERED AND REIMBURSEMENT OF EXPENSES
FOR PERIOD FROM FEBRUARY 1, 2020 THROUGH
AUGUST 31, 2020**

I, John H. Genovese, certify that the following is true to the best of my knowledge information, and belief:

1. I am an attorney and shareholder of the law firm of Genovese Joblove & Battista, P.A. (“GJB”), with four offices in Florida located at 100 SE 2nd Street, Suite 44th Floor, Miami, FL 33131 (“Miami”); 200 East Broward Boulevard, Suite 1110, Fort Lauderdale, Florida 33301 (“Ft. Lauderdale”), Edison Theatre Building, 1533 Hendry Street, Suite 301 Fort Myers, FL 33901 (“Fort Myers”); and 100 N. Tampa Street, Suite 2600, Tampa, Florida (“Tampa”). GJB also has

¹ The Debtors in these jointly-administered PROMESA title III cases, along with each Debtor’s respective title III case number listed as a bankruptcy case number due to software limitations and the last four (4) digits of each Debtor’s federal tax identification number, as applicable, are: (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation (Bankruptcy Case No. 17 BK 3284) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (Bankruptcy Case No. 17 BK 3566-LTS) (Last Four Digits of Federal Tax ID: 9686); (v) Puerto Rico Electric and Power Authority (Bankruptcy Case No. 17 BK 4780) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority (Bankruptcy Case No. 19 BK 5523-LTS) (Last Four Digits of Federal Tax ID: 3801).

an affiliate office in Caracas Venezuela located at Av. Francisco de Miranda, Torre Provincial "A" piso 8 oficina 81 y 82 1060 Caracas, Venezuela.

2. I am admitted to practice law in the state of Florida. By order dated April 16, 2019, I was admitted to appear *Pro Hac Vice* in the Debtors Title III Cases [Docket No. 6330].

3. I am duly authorized to make this Certification on behalf of GJB. The facts set forth in this Certification are based upon my personal knowledge, my discussions with other GJB attorneys, and the review of GJB's client/matter records by me or other GJB attorneys acting under my supervision and direction.

4. In accordance with (a) Local Bankruptcy Rule 2016-1 (the "Local Guidelines"), (b) Appendix B of the United States Trustee Guidelines for Reviewing Applications for Compensation and Reimbursement of Expenses Filed Under 11 U.S.C. § 330, effective as of November 1, 2013 (the "U.S. Trustee Guidelines"), and (c) the *Second Amended Order Setting Procedures for Interim Compensation and Reimbursement of Expenses of Professionals entered June 6, 2018* (the "Interim Compensation Order"), this Certification is made with respect to the *Second Interim Application of Genovese Joblove & Battista, P.A., as Special Litigation Counsel to Official Committee of Unsecured Creditors, for Services Rendered and Reimbursement of Expenses for the Period from October 1, 2019 through January 31, 2020* (the "Application").²

5. Pursuant to section (a)(4) of the Local Guidelines, I hereby certify that I have read the Application and, to the best of my knowledge, information, and belief, formed after reasonable inquiry, (a) the compensation and reimbursement of expenses sought in the Application conforms with the Bankruptcy Code, the Bankruptcy Rules, the U.S. Trustee Guidelines, and the Local Rules, (b) the compensation and reimbursement of expenses are billed at rates no less favorable to

² Capitalized terms used herein shall have the same meanings given to them in the Application.

the Debtors than those customarily employed by GJB generally (taking into consideration that GJB employs a variety of fee arrangements with its clients, including hourly fees, contingency fees and hybrid fees involving reduced hourly rates and reduced contingency fee percentages) and billed in accordance with the Engagement Letter and Retention Order; and (c) in providing a reimbursable services, GJB does not make a profit on that service, whether the service is performed by GJB in-house or through a third party.

6. In accordance with the Engagement Letter and Retention Order, GJB agreed to take a voluntary fee reduction equal to 20%, which results in a reduction in the amount of \$224,908.40 in the Application. GJB seeks allowance of all of its fees incurred during the Application Period in the amount of \$899,633.60, to the extent such amount has not been paid before the hearing scheduled on this Application).

7. GJB provides the following response to the request for information set forth in the U.S. Trustee Guidelines:

Question: Did you agree to any variations from, or alternatives to, your standard or customary billing rates, fees, or terms for services pertaining to this engagement that were provided during the Application Period?

Response: Yes. As a courtesy to the Committee and based on circumstances unique to the Title III Case, during the Application Period, GJB agreed to a voluntary reduction of its fees by an amount equal to 20% of the total fees sought to be paid, which reduction totals \$224,908.40.

Question: If the fees sought in this application as compared to the fees budgeted for the Application Period are higher by 10% or more, did you discuss the reasons for the variation with the client?

Response: The fees were below the budgeted amount, therefore the request is not applicable.

Question: Have any of the professionals included in this application varied their hourly rate based on the geographic location of the bankruptcy case?

Response: No.

Question: Does the application include time or fees related to reviewing or revising time records or preparing, reviewing, or revising invoices? (This is limited to work involved in preparing and editing billing records that would not be compensable outside of bankruptcy and does not include reasonable fees for preparing a fee application.) If so, please quantify by hours and fees.

Response: The Application includes approximately 89.40 hours and associated fees of approximately \$34,861.50 related to preparing, reviewing, and revising GJB's fee statements.

Question: Does this application include time or fees for reviewing time records to redact any privileged or other confidential information? If so, please quantify by hours and fees.

Response: No.

Question: If the application includes any rate increases since retention: (i) Did your client review and approve those rate increases in advance? (ii) Did your client agree when retaining the law firm to accept all future rate increases? If not, did you inform your client that they need not agree to modified rates or terms in order to have you continue the representation consistent with ABA Formal Ethics Opinion 11-458?

Response: No rate increases have occurred since the retention date.

8. I declare under penalty of perjury that, to the best of my knowledge and after reasonable inquiry, the foregoing is true and correct.

Executed this 16th day of November, 2020.

/s/ John H. Genovese

John H. Genovese
GENOVESE JOBLOVE & BATTISTA, P.A.
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EXHIBIT B

CUSTOMARY AND COMPARABLE COMPENSATION DISCLOSURES

(See Guidelines ¶ C.3. for definitions of terms used in this Exhibit.)

CATEGORY OF TIMEKEEPER (using categories already maintained by the firm)	BLENDED HOURLY RATE		
	NON-BANKRUPTCY BLENDED HOURLY RATE	GJB BLENDED HOURLY RATE¹	GJB BLENDED HOURLY RATE (AFTER 20% REDUCTION)²
Partner	\$506	\$587	\$470
Counsel	N/A	N/A	N/A
Associate	\$306	\$339	\$271
All timekeepers aggregated	\$424	\$419	\$335

¹ The calculation of GJB's Blended Hourly Rate does not take into account GJB's agreement to reduce its fees by an amount equal to 20% of its total hourly fees.

² For illustrative purposes only.

EXHIBIT C

SUMMARY OF TIMEKEEPERS INCLUDED IN THIS APPLICATION

Name	Title or Position	Department, Group, or Section	Date of First Admission	Fees Billed in this Application	Hours Billed in this Application	Hourly Rate Billed		Number of Rate Increases Since Case Inception
						In this Application	In Third Interim Application	
Arrastia, John	Partner	Litigation	1996	\$269,215.00	472.10	\$550.00	\$550.00	0
Friedman, Michael A.	Partner	Bankruptcy	2009	\$21,615.00	42.90	\$550.00	\$550.00	1
Gayo-Guitian, Mariaelena	Partner	Bankruptcy	1989	\$39,272.50	93.00	\$575.00	\$575.00	0
Genovese, John H.	Partner	Bankruptcy	1979	\$245,259.00	329.60	\$765.00	\$765.00	1
Gonzalez, Alfredo L.	Partner	Corporate	1978	\$56,330.50	99.70	\$565.00	\$565.00	0
Suarez, Jesus M.	Partner	Bankruptcy	2008	\$110,200.00	220.40	\$500.00	\$500.00	1
Jacobs, Eric	Partner	Bankruptcy	2010	\$15,247.50	32.30	\$475.00	\$475.00	0
		Total Partner:		\$757,139.50	1,290.00			
Bado, Jean-Pierre	Associate	Litigation	2016	\$51,675.00	137.80	\$375.00	\$375.00	1
Castaldi, Angelo	Associate	Litigation	2009	\$124,312.50	334.30	\$375.00	\$375.00	1
Sadovnic, Irina	Associate	Litigation	2018	\$8,085.00	56.10	\$350.00	\$350.00	0
Joyce A. Delgado	Associate	Litigation	2017	\$53,392.50	173.00	\$315.00	N/A	N/A
		Total Associate:		\$237,465.00	701.20			
Hopkins, Colleen	Paralegal			\$4,524.00	24.70	\$195.00	\$195.00	0
Sardina, Jessey	Paralegal			\$952.50	16.00	\$75.00	\$75.00	0
Zamora, Johanna	Paralegal			\$34,437.00	178.70	\$195.00	\$195.00	0
Garcia-Montes, Tricia	Paralegal			\$24.00	0.60	\$120.00	\$120.00	0
Siff, Steve	Paralegal			\$87,945.00	456.70	\$195.00	\$195.00	0

Esser, Carolyn	Paralegal			\$2,055.00	13.70	\$150.00	\$150.00	0
Brooke Traina	Paralegal			N/A	0.70	\$195.00	N/A	N/A
		Total Paraprofessional:		\$129,937.50	691.10			
	Total:			\$1,124,542.00	2,682.30			
	Blended Rate:			\$419.24				
	Blended Rate Excluding Paraprofessionals:			\$499.49				

EXHIBIT D

BUDGET AND STAFFING PLAN

EXHIBIT D-1

BUDGETS FOR:
FEBRUARY 2020
MARCH 2020
APRIL 2020
MAY 2020
JUNE 2020
JULY 2020
AUGUST 2020

Case Name and Number: 17 BK 3283-LTS (Jointly Administered)
Applicant's Name: Genovese, Joblove & Battista, P.A., as Special Litigation Counsel
to the Official Committee Of Unsecured Creditors
Of The Commonwealth Of Puerto Rico, *et al.*

BUDGET

Period Covered: February 1, 2020 through February 29, 2020¹

U.S. Trustee Task Code and Project Category	Estimated Hours for Period February 1, 2020 through February 29, 2020
B110 Case Administration <i>Notes: This task code includes general case strategy and planning, case management, internal Committee matters, internal meetings, and meetings with Paul Hastings.</i>	25
B112 General Creditor Inquiries <i>Notes: This task code includes responding to and addressing questions and inquiries from creditors.</i>	2

¹ Unless otherwise indicated, this proposed budget is based on the following assumptions: (i) no additional title III cases or adversary proceedings will be commenced during the budget period; (ii) no plan of adjustment will be filed during the budget period; (iii) no adversary proceedings will require discovery and trial preparation; and (iv) all adversary proceedings in which the Committee has intervened and/or sought to intervene will only involve briefing and hearings on motions to dismiss, motions to stay, and/or pretrial proceedings. In addition, it is impossible to predict how many hours will be required to prosecute contested matters where GJB is asked to participate as conflicts counsel. Thus, this proposed budget may be materially different from the work actually performed. For instance, discovery disputes may lead to extensive litigation. Similarly, the Committee may need to respond to motions that are not and cannot be anticipated. At this time, the proposed budget is speculative. The proposed amended budget has been revised to account for the Stay Order announced by the Court on July 24, 2019, at the Omnibus Hearing (as subsequently modified and extended until March 11, 2020), with regard to several adversary proceedings for which the Committee has been appointed as co-plaintiff/co-trustee with the Oversight Board or the members of the Special Claims Committee, as well as the recommendations of the Mediation Team, the revised briefing schedule, the rescheduled PREPA RSA 9019 hearing, and the December 10, 2019 Magistrate Judge's Stay Order.

<p>B113 Pleadings Review</p> <p><i>Notes: This task code includes review of relevant pleadings in the title III cases as well as all related adversary proceedings. GJB will focus its review on matters that impact its scope of work.</i></p>	20
<p>B120 Asset Analysis and Recovery</p> <p><i>Notes: This task code includes review and analysis of the Debtors' assets, including proceeds from insurance policies.</i></p>	0
<p>B130 Asset Disposition</p> <p><i>Notes: This task code includes work related to the Debtors' efforts to sell or otherwise dispose of their assets.</i></p>	0
<p>B140 Relief from Stay / Adequate Protection Proceedings</p> <p><i>Notes: This task code includes work related to motions for relief from stay, including the stay relief motion filed by the ERS bondholders and the receiver motion filed by the PREPA bondholders. Further, GJB is not taking an active role on the run-of-the-mill stay relief requests and its role in this category is limited to instances, if any, where Paul Hastings may have a conflict. .</i></p>	0
<p>B150 Meetings of Creditors' Committee and Communications with Creditors</p> <p><i>Notes: This task code includes time spent on telephone conferences, meetings, and other communications with the Committee, including preparation for such calls and meetings. GJB will focus its participation on matters that impact its scope of work and avoid unnecessary duplication with Paul Hastings.</i></p>	22

<p>B155 Court Hearings</p> <p><i>Notes: This task codes includes time spent in court hearings in the title III cases and the related adversary proceedings. This task code also includes time spent preparing for such hearings. GJB will focus its participation on matters that impact its scope of work and avoid unnecessary duplication with Paul Hastings and the Special Claims Committee</i></p>	15
<p>B160 Employment / Fee Applications</p> <p><i>Notes: This task code includes time spent on complying with the interim compensation order, including preparing GJB's fee statements, as well as responding to inquiries from the fee examiner related thereto.</i></p>	13
<p>B161 Budgeting (Case)</p> <p><i>Notes: This task code includes time spent on preparing GJB's monthly budgets, as required by the fee examiner.</i></p>	2
<p>B165 Fee and Employment Applications of Other Professionals</p> <p><i>Notes: This task code includes time spent on reviewing fee and retention applications of other professionals in these title III cases only as it relates to (i) committee professionals operating at the direction of GJB as conflicts counsel; or (ii) where matters principally handled by GJB are implicated.</i></p>	2
<p>B170 Fee and Employment Objections</p> <p><i>Notes: This task code includes time spent on preparing or responding to objections to fee and retention applications.</i></p> <p><i>Prior monthly average: ~ hours.</i></p> <p><i>Trailing two-month average: ~ hours.</i></p>	2

<p>B180 Avoidance Action Analysis</p> <p><i>Notes: This task code includes time spent on analyzing potential claims for avoidance, including preferential transfers and fraudulent transfers. GJB will focus its participation on matters that impact its scope of work and avoid unnecessary duplication with Paul Hastings or other counsel handling such matters for the Committee or the Special Claims Committee, to the extent it is a Co-Plaintiff.</i></p>	<p>10</p>
<p>B185 Assumption / Rejection of Leases and Contracts</p> <p><i>Notes: This task code includes time spent on analyzing issues related to the assumption or rejection of executory contracts and unexpired leases. GJB is role in this category is limited to instances, if any, where Paul Hastings may have a conflict. .</i></p>	<p>0</p>
<p>B190 Other Contested Matters</p> <p><i>Notes: This task code includes time spent on all contested matters in the title III cases. GJB's role in this category is limited to instances, if any, where Paul Hastings may have a conflict. GJB anticipates potential main case litigation concerning matters where Paul Hastings has identified conflicts with parties that may become potentially adverse to the Committee. Further, adverse and interested parties to litigation initiated by GJB on behalf of the Committee have sought to participate in main case issues, including claims objections. Currently, the disputes in which GJB has primary responsibility are limited in scope due to the stay orders in effect.</i></p> <p><i>GJB anticipates primary responsibility for 9019 dispute regarding an adversary defendant, which would be a potentially heavily litigated contested matter.</i></p>	<p>40</p>

191 General Litigation (including Commonwealth litigation, mediation process, and handling of adversary proceedings)

Notes: This task code includes time spent on litigation matters, including all adversary proceedings. We anticipate that work under this task code will include (a) the joint prosecution of causes of action together with Oversight Board/Special Claims Committee in 22 separate lawsuits, and (b) monitoring other adversary proceedings and litigation. GJB's role in this category is limited to those adversary proceedings in which GJB has appeared as and is the lead counsel for the Committee. This role may require coordination with other counsel in related matters concerning global legal issues. Currently, many of these matters are stayed pursuant to Court orders in effect.

GJB anticipates primary responsibility regarding an adversary proceeding removed to the PROMESA court regarding monoline insurers' claims against underwriter defendants.

GJB anticipates continued briefing relating to motion practice relating to pending adversary proceedings and continued discovery as to limited issues excepted from the Stay or pursuant to the Mediation Team's recommendation

GJB anticipates a continued and limited stay of litigation on behalf of PREPA regarding fuel oil claims, which also includes the motion practice relating to the class action plaintiffs' effort to intervene. During the stay period, GJB anticipates preparing for post-stay litigation and discovery. Certain Fuel Oil-related litigation is not stayed, and may be subject to briefing at the Committee's discretion.

GJB anticipates continued prosecution of causes of action with the Oversight Board/Special Claims Committee regarding any conflicts regarding prosecution of the ERS lien challenges

205

<p>B195 Non-Working Travel²</p> <p><i>Notes: This task code includes time spent on non-working travel, including to court hearings and Committee meetings in San Juan, Boston and New York City, although attendance will be limited if required due to a conflict on behalf of Paul Hastings.</i></p>	20
<p>B210 Debtors' Financial Information and Operations/Fiscal Plan</p> <p><i>Notes: This task code includes time spent reviewing and analyzing the Debtors' fiscal plans and related matters. GJB is role in this category is limited to instances, if any, where Paul Hastings may have a conflict or where GJB may need to familiarize itself with matters that may impact litigation where GJB is serving as conflicts counsel to the Committee.</i></p>	5
<p>B220 Employee Benefits/Pensions</p> <p><i>Notes: This task code includes time spent reviewing and analyzing matters related to retiree benefit claims.</i></p>	0
<p>B230 Financing / Cash Collections</p> <p><i>Notes: This task code includes time spent on dealing with the Debtors' requests for financing, most notably the financing sought by PRASA.</i></p>	0
<p>B231 Security Document Analysis</p> <p><i>Notes: This task code includes time spent on reviewing and analyzing security documents and results from lien searches.</i></p>	0

² The firm charges one-half a timekeeper's normal billing rate for any time incurred on account of non-working travel.

<p>B260 Meetings of and Communications with Debtors/Oversight Board</p> <p><i>Notes: This task code includes time spent on meeting and communicating with the Debtors, the Oversight Board, and their respective advisors. GJB anticipates significant collaboration with the Special Claims Committee of the FOMB on matters GJB has appears as conflicts counsel.</i></p>	<p>23</p>
<p>B261 Investigations</p>	<p>0</p>
<p>B310 Claims Administration and Objections</p> <p><i>Notes: This task code includes time spent on matters related to claims administration, including time spent on investigating potential challenges to claims, including, most notably, the challenge to the GO bond claims and the ERS bond claims. This task code also includes time spent on analyzing the pool of unsecured claims against the Debtors. GJB is role in this category is limited to instances, if any, where Paul Hastings may have a conflict.</i></p>	<p>10</p>
<p>B320 Plan and Disclosure Statement</p> <p><i>Notes: This task code includes time spent on matters related to a potential plan of adjustment for the title III Debtors. GJB will focus its participation on matters that impact its scope of work and avoid unnecessary duplication with Paul Hastings. Given the Oversight Board's recent filing of the Commonwealth plan of adjustment, GJB anticipates spending time familiarizing itself with matters that may impact litigation where GJB is serving as conflicts counsel to the Committee.</i></p>	<p>140</p>

<p>B420 Restructurings</p> <p><i>Notes: This task code includes time spent on general restructuring matters, including the PREPA RSA and the related 9019 motion.</i></p> <p><i>GJB anticipates continued involvement in the PREPA RSA 9019 dispute with respect to CITI and any other conflict situations, currently scheduled for hearing to commence in March 2020.</i></p>	<p>35</p>
TOTAL HOURS	591
TOTAL ESTIMATED FEE³	\$270,920.31
MINUS 20% REDUCTION	\$54,184.06
TOTAL ESTIMATED FEE (NET OF REDUCTION)	\$216,736.25

³ Assumes Blended Rate of \$458.41

**ADDITIONAL STAFFING PLANS (INCL. SUB-BUDGETS)
FOR MATTERS JOINTLY PURSUED BY OVERSIGHT BOARD AND COMMITTEE**

Period Covered: February 1, 2020 through February 29, 2020

A. Adversary Proceedings Against Financial Parties and Fuel Oil Defendants

Genovese Joblove & Battista PA., (“GJB” or “Firm”) as the Committee’s special litigation counsel, represents the Committee with respect to two separate adversary proceedings against: (a) numerous underwriters and other financial target parties involved in the issuance of Commonwealth bonds [Adv. Proc. No. 19-280-LTS]; and (b) the claims of PREPA against fuel oil suppliers and laboratories to avoid certain fraudulent transfers [Adv. Pro. No. 19-388-LTS] (which is not stayed).

The stay relating to Adv. Proc. No. 19-280 was set to expire in February 2020, but the proposed interim case management order submitted by the mediation team would continue that stay and such stay has been implemented on an interim basis.

This representation includes the evaluation and if warranted, litigation of, a lawsuit filed by certain monoline insurers to assert claims against the same defendants sued by the Committee in Adv. Proc. No. 19-280-LTS, which monoline suit has been removed to the PROMESA proceedings.

The litigation in Adv. Proc. No. 19-388-LTS has been stayed through June 2020 with certain court-imposed obligations prior to that time. Related litigation exists that must be evaluated and considered.

1. Staffing Plan

Category of timekeeper (using categories maintained by the firm)	Number of timekeepers expected to work on the matter during the budget period	Average hourly rate for period February 1, 2020 through February 29, 2020	Average hourly rate for period February 1, 2020 through February 29, 2020 (net of 20% reduction)
Partner (20+ Years)	2	\$680	\$544
Partner (10+ Years)	2	\$525	\$420
Associate	4	\$375	\$300
Paraprofessionals	2	\$195	\$156

2. Sub-Budget

U.S. Trustee Task Code and Project Category	Estimated Hours for Period February 1, 2020 through February 29, 2020
B191 General Litigation	140
TOTAL HOURS	140

B. Garden-Variety Avoidance Actions

GJB represents the Committee with respect to limited “garden-variety” avoidance actions [Adv. Proc. Nos. 19-267, 19-275-279]. Casillas, Santiago & Torres LLC, the Committee’s local counsel, represents the Committee with respect to the balance of the “garden-variety” avoidance actions initiated against vendors of the Commonwealth of Puerto Rico [Adv. Proc. Nos. 19-041 to 19-279, Adv. Proc. Nos. 19-347 to 19-354, and additional adversary proceedings to be commenced with respect to PREPA]. However, GJB may, from time-to-time, provide additional assistance to other committee counsel with respect to litigation matters within GJB’s subject matter expertise, but in no way duplicative of the work performed by other counsel on these matters.

1. Staffing Plan

Category of timekeeper (using categories maintained by the firm)	Number of timekeepers expected to work on the matter during the budget period	Average hourly rate for period February 1, 2020 through February 29, 2020	Average hourly rate for period February 1, 2020 through February 29, 2020 (net of 20% reduction)
Partner (20+ Years)	2	\$575	\$460
Partner (10+ Years)	2	\$500	\$400
Associate	2	\$375	\$300
Paraprofessionals	2	\$195	\$156

2. Sub-Budget

U.S. Trustee Task Code and Project Category	Estimated Hours for Period February 1, 2020 through February 29, 2020
B191 General Litigation	20
TOTAL HOURS	20

We also note that, on June 7, 2019, the Co-Plaintiffs in these avoidance actions filed a motion [Docket No. 7325] seeking approval of, among other things, procedures establishing a framework for streamlined execution of settlement agreements and procedures and guidelines for resolving the avoidance actions through a voluntary mediation process. On July 12, 2019, the Court entered an “*Order Granting Omnibus Motion by the Financial Oversight and Management Board for Puerto Rico, acting by and through the Members of the Special Claims Committee and the Official Committee of Unsecured Creditors to (i) Establish Litigation Case Management Procedures and (ii) Establish Procedures for Approval of Settlements.*” On December 6, 2019, the Court entered an “*Order Granting Omnibus Motion to Extend Deadlines in Order Granting Omnibus Motion by the Financial Oversight and Management Board for Puerto Rico, acting by and through the Members of the Special Claims Committee and the Official Committee of Unsecured Creditors to (i) Establish Litigation Case Management Procedures and (ii) Establish Procedures for Approval of Settlements.*” Accordingly, the Response Due Date was extended to April 13, 2020, the Motion to Dismiss Response Date was extended to May 13, 2020 and the Reply Deadline was extended to June 13, 2020. Accordingly, GJB anticipates that its workload with respect to “garden-variety” avoidance actions will be reduced.

C. Currently Stayed Co-Plaintiff Adversary Proceedings

Pursuant to Judge Swain’s Order at the July 24th, 2019, Omnibus Hearing (as subsequently modified), the Court extended the stayed, until December 29, 2019, several adversary proceedings for which the Committee has been appointed as Co-Plaintiff/Co-Trustee with the Oversight Board or the members of the Special Claims Committee. These matters remain stayed until March 11, 2020, while the parties work with the mediators on a process to resolve these adversary proceedings and other plan related matters.

- Eight adversary proceedings seeking to recover fraudulent transfers made on account of GO bonds that were not validly issued [Adv. Proc. No. 19-281, Adv. Proc. No. 19-282, Adv. Proc. No. 19-283, Adv. Proc. No. 19-284, Adv. Proc. No. 19-285, Adv. Proc. No. 19-286, Adv. Proc. No. 19-287, and Adv. Proc. No. 19-288];
- Four adversary proceedings challenging liens asserted by certain holders of HTA bonds [Adv. Proc. No. 19-362, Adv. Proc. No. 19-363, Adv. Proc. No. 19-364, and Adv. Proc. No. 19-365]; and
- One adversary proceeding challenging liens asserted by certain holders of GO

bonds Adv. Proc. No. 19-297].

Accordingly, GJB does not expect to expend any significant time on these adversary proceedings during the month of February 2020 other than minor administrative and/or procedural work, including responding to inquiries from defendants and assisting Brown Rudnick and Proskauer, in general administration of these cases.

1. Staffing Plan

Category of timekeeper (using categories maintained by the firm)	Number of timekeepers expected to work on the matter during the budget period	Average hourly rate for period February 1, 2020 through February 29, 2020	Average hourly rate for period February 1, 2020 through February 29, 2020 (net of 20% reduction)
Partner (20+ Years)	2	\$575	\$460
Partner (10+ Years)	2	\$500	\$400
Associate	2	\$375	\$300
Paraprofessionals	2	\$195	\$156

2. Sub-Budget

U.S. Trustee Task Code and Project Category	Estimated Hours for Period February 1, 2020 through February 29, 2020
B191 General Litigation	25
TOTAL HOURS	25

D. ERS Lien Co-Plaintiff Adversary Proceedings

Proskauer Rose LLP, as counsel to the Oversight Board, has primary responsibility for the adversary proceedings seeking declarations on the scope of the liens purportedly securing the ERS bonds [Adv. Proc. No. 19-366 and Adv. Proc. No. 19-367]. GJB is counsel of record for the Committee in Adv. Proc. No. 19-367. These matters had been stayed pursuant to the July 25th, 2019 Order, but on October 24, 2019, the Court approved a scheduling order regarding discovery and summary judgment briefing on the lien scope issues and *ultra vires* issues with respect to the ERS bonds and lifted the stay. Accordingly, (a) the lien scope litigation, *i.e.*, Adv. Proc. No. 19-366 and Adv. Proc. No. 19-367 and (b) Count I of the complaints seeking to recover fraudulent transfers made on account of ERS bonds that were not validly issued, *i.e.*,

Adv. Proc. No. 19-355, Adv. Proc. No. 19-356, Adv. Proc. No. 19-357, Adv. Proc. No. 19-358, Adv. Proc. No. 19-359, and Adv. Proc. No. 19-361, were unstayed. As such, certain issues, filing of pleadings and discovery has resumed in part. GJB's involvement in the lien scope litigation is expected to be minimal and limited to Adv. Proc. No. 19-367.

Accordingly, GJB anticipates the commensurate amount of time on these adversary proceedings during the month of February 2020 handling, among other things, the *ultra vires* issues as they relate to Count I of the recovery actions.

1. Staffing Plan

Category of timekeeper (using categories maintained by the firm)	Number of timekeepers expected to work on the matter during the budget period	Average hourly rate for period February 1, 2020 through February 29, 2020	Average hourly rate for period February 1, 2020 through February 29, 2020 (net of 20% reduction)
Partner (20+ Years)	2	\$575	\$460
Partner (10+ Years)	2	\$500	\$400
Associate	2	\$375	\$300
Paraprofessionals	2	\$195	\$156

2. Sub-Budget

U.S. Trustee Task Code and Project Category	Estimated Hours for Period February 1, 2020 through February 29, 2020
B191 General Litigation	20
TOTAL HOURS	20

E. Contested Matters.

GJB represents the Committee with respect to several issues, including the following: the Adversary Defendants motion to participate in the GO Bond Claim Objections (and related mediation process); PREPA 9019 Motion relating to the RSA; and anticipated, litigated contested matters that are currently under advisement by the Committee. GJB anticipates its involvement in the PREPA 9019 will increase during the month of February as hearing preparation continues.

1. Staffing Plan

Category of timekeeper (using categories maintained by the firm)	Number of timekeepers expected to work on the matter during the budget period	Average hourly rate for period February 1, 2020 through February 29, 2020	Average hourly rate for period February 1, 2020 through February 29, 2020 (net of 20% reduction)
Partner (20+ Years)	3	\$645	\$516
Partner (10+ Years)	2	\$525	\$420
Associate	4	\$375	\$300
Paraprofessionals	2	\$195	\$156

2. Sub-Budget

U.S. Trustee Task Code and Project Category	Estimated Hours for Period February 1, 2020 through February 29, 2020
B190 Other Contested Matters	40
TOTAL HOURS	40

GENERAL STAFFING PLAN

Period Covered: February 1, 2020 through February 29, 2020⁴

Category of	Number of	Average hourly	Average hourly
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⁴ Unless otherwise indicated in this budget, this proposed staffing plan is based on the following assumptions: (i) no additional title III cases or adversary proceedings will be commenced during the budget period; (ii) no plan of adjustment will be filed during the budget period; (iii) no adversary proceedings will require discovery and trial preparation; and (iv) all adversary proceedings in which the Committee has intervened and/or sought to intervene will only involve briefing and hearings on motions to dismiss and/or pretrial proceedings. In addition, it is impossible to predict how many hours will be required to prosecute contested matters where GJB is asked to participate as conflicts counsel. Thus, this proposed budget may be materially different from the work actually performed. For instance, discovery disputes may lead to extensive litigation. Similarly, the Committee may need to respond to motions that are not and cannot be anticipated. At this time, the proposed budget is speculative. The proposed amended budget has been revised to account for the stay of litigation and other proceedings.

timekeeper (using categories maintained by the firm)	timekeepers expected to work on the matter during the budget period	rate for period February 1, 2020 through February 29, 2020	rate for period February 1, 2020 through February 29, 2020 (net of 20% reduction)
Partner (20+ Years)	5	\$615	\$492
Partner (10+ Years)	2	\$525	\$420
Associate	4	\$375	\$300
Paraprofessionals	2	\$195	\$156

Case Name and Number: 17 BK 3283-LTS (Jointly Administered)
Applicant's Name: Genovese, Joblove & Battista, P.A., as Special Litigation Counsel
to the Official Committee Of Unsecured Creditors
Of The Commonwealth Of Puerto Rico, *et al.*

BUDGET

Period Covered: March 1, 2020 through March 31, 2020¹

U.S. Trustee Task Code and Project Category	Estimated Hours for Period March 1, 2020 through March 31, 2020
B110 Case Administration <i>Notes: This task code includes general case strategy and planning, case management, internal Committee matters, internal meetings, and meetings with Paul Hastings.</i>	25
B112 General Creditor Inquiries <i>Notes: This task code includes responding to and addressing questions and inquiries from creditors.</i>	2

¹ Unless otherwise indicated, this proposed budget is based on the following assumptions: (i) no additional title III cases or adversary proceedings will be commenced during the budget period; (ii) no plan of adjustment will be filed during the budget period; (iii) no adversary proceedings will require discovery and trial preparation; and (iv) all adversary proceedings in which the Committee has intervened and/or sought to intervene will only involve briefing and hearings on motions to dismiss, motions to stay, and/or pretrial proceedings. In addition, it is impossible to predict how many hours will be required to prosecute contested matters where GJB is asked to participate as conflicts counsel. Thus, this proposed budget may be materially different from the work actually performed. For instance, discovery disputes may lead to extensive litigation. Similarly, the Committee may need to respond to motions that are not and cannot be anticipated. At this time, the proposed budget is speculative. The proposed budget has been revised to account for the Stay Order announced by the Court on July 24, 2019, at the Omnibus Hearing (as subsequently modified and extended until March 11, 2020), with regard to several adversary proceedings for which the Committee has been appointed as co-plaintiff/co-trustee with the Oversight Board or the members of the Special Claims Committee, as well as the recommendations of the Mediation Team as set forth in the Amended Report and Recommendation filed March 10, 2020, the revised briefing schedule, the rescheduled PREPA RSA 9019 hearing, and the December 10, 2019 Magistrate Judge's Stay Order.

<p>B113 Pleadings Review</p> <p><i>Notes: This task code includes review of relevant pleadings in the title III cases as well as all related adversary proceedings. GJB will focus its review on matters that impact its scope of work.</i></p>	<p>30</p>
<p>B120 Asset Analysis and Recovery</p> <p><i>Notes: This task code includes review and analysis of the Debtors' assets, including proceeds from insurance policies.</i></p>	<p>0</p>
<p>B130 Asset Disposition</p> <p><i>Notes: This task code includes work related to the Debtors' efforts to sell or otherwise dispose of their assets.</i></p>	<p>0</p>
<p>B140 Relief from Stay / Adequate Protection Proceedings</p> <p><i>Notes: This task code includes work related to motions for relief from stay, including the stay relief motion filed by the ERS bondholders and the receiver motion filed by the PREPA bondholders. Further, GJB is not taking an active role on the run-of-the-mill stay relief requests and its role in this category is limited to instances, if any, where Paul Hastings may have a conflict.</i></p>	<p>0</p>
<p>B150 Meetings of Creditors' Committee and Communications with Creditors</p> <p><i>Notes: This task code includes time spent on telephone conferences, meetings, and other communications with the Committee, including preparation for such calls and meetings. GJB will focus its participation on matters that impact its scope of work and avoid unnecessary duplication with Paul Hastings.</i></p>	<p>25</p>

<p>B155 Court Hearings</p> <p><i>Notes: This task codes includes time spent in court hearings in the title III cases and the related adversary proceedings. This task code also includes time spent preparing for such hearings. GJB will focus its participation on matters that impact its scope of work and avoid unnecessary duplication with Paul Hastings and the Special Claims Committee.</i></p>	<p>15</p>
<p>B160 Employment / Fee Applications</p> <p><i>Notes: This task code includes time spent on complying with the interim compensation order, including preparing GJB's fee statements, as well as responding to inquiries from the fee examiner related thereto.</i></p>	<p>35</p>
<p>B161 Budgeting (Case)</p> <p><i>Notes: This task code includes time spent on preparing GJB's monthly budgets, as required by the fee examiner.</i></p>	<p>5</p>
<p>B165 Fee and Employment Applications of Other Professionals</p> <p><i>Notes: This task code includes time spent on reviewing fee and retention applications of other professionals in these title III cases only as it relates to (i) committee professionals operating at the direction of GJB as conflicts counsel; or (ii) where matters principally handled by GJB are implicated.</i></p>	<p>2</p>
<p>B170 Fee and Employment Objections</p> <p><i>Notes: This task code includes time spent on preparing or responding to objections to fee and retention applications.</i></p>	<p>2</p>

<p>B180 Avoidance Action Analysis</p> <p><i>Notes: This task code includes time spent on analyzing potential claims for avoidance, including preferential transfers and fraudulent transfers. GJB will focus its participation on matters that impact its scope of work and avoid unnecessary duplication with Paul Hastings or other counsel handling such matters for the Committee or the Special Claims Committee, to the extent it is a Co-Plaintiff.</i></p>	<p>10</p>
<p>B185 Assumption / Rejection of Leases and Contracts</p> <p><i>Notes: This task code includes time spent on analyzing issues related to the assumption or rejection of executory contracts and unexpired leases. GJB is role in this category is limited to instances, if any, where Paul Hastings may have a conflict.</i></p>	<p>0</p>
<p>B190 Other Contested Matters</p> <p><i>Notes: This task code includes time spent on all contested matters in the title III cases. GJB's role in this category is limited to instances, if any, where Paul Hastings may have a conflict. GJB anticipates potential main case litigation concerning matters where Paul Hastings has identified conflicts with parties that may become potentially adverse to the Committee. Further, adverse and interested parties to litigation initiated by GJB on behalf of the Committee have sought to participate in main case issues, including claims objections. Currently, the disputes in which GJB has primary responsibility are limited in scope due to the stay orders in effect. GJB anticipates primary responsibility for 9019 dispute regarding an adversary defendant, which would be a potentially heavily litigated contested matter.</i></p>	<p>50</p>

191 General Litigation (including Commonwealth litigation, mediation process, and handling of adversary proceedings)

Notes: This task code includes time spent on litigation matters, including all adversary proceedings. We anticipate that work under this task code will include (a) the joint prosecution of causes of action together with Oversight Board/Special Claims Committee in 22 separate lawsuits, and (b) monitoring other adversary proceedings and litigation. GJB's role in this category is limited to those adversary proceedings in which GJB has appeared as and is the lead counsel for the Committee. This role may require coordination with other counsel in related matters concerning global legal issues. Currently, many of these matters are stayed pursuant to Court orders in effect.

GJB anticipates primary responsibility regarding an adversary proceeding removed to the PROMESA court regarding monoline insurers' claims against underwriter defendants.

GJB anticipates continued briefing relating to motion practice relating to pending adversary proceedings and continued discovery as to limited issues excepted from the Stay or pursuant to the Mediation Team's Amended Report and Recommendation

GJB anticipates a continued and limited stay of litigation on behalf of PREPA regarding fuel oil claims, which also includes the motion practice relating to the class action plaintiffs' effort to intervene. During the stay period, GJB anticipates preparing for post-stay litigation and discovery. Certain Fuel Oil-related litigation is not stayed, and may be subject to briefing at the Committee's discretion.

GJB anticipates continued prosecution of causes of action with the Oversight Board/Special Claims Committee regarding any conflicts regarding prosecution of the ERS lien challenges as modified by the ERS Scheduling Order.

150

<p>B195 Non-Working Travel²</p> <p><i>Notes: This task code includes time spent on non-working travel, including to court hearings and Committee meetings in San Juan, Boston and New York City, although attendance will be limited if required due to a conflict on behalf of Paul Hastings.</i></p>	<p>20</p>
<p>B210 Debtors' Financial Information and Operations/Fiscal Plan</p> <p><i>Notes: This task code includes time spent reviewing and analyzing the Debtors' fiscal plans and related matters. GJB is role in this category is limited to instances, if any, where Paul Hastings may have a conflict or where GJB may need to familiarize itself with matters that may impact litigation where GJB is serving as conflicts counsel to the Committee.</i></p>	<p>5</p>
<p>B220 Employee Benefits/Pensions</p> <p><i>Notes: This task code includes time spent reviewing and analyzing matters related to retiree benefit claims.</i></p>	<p>0</p>
<p>B230 Financing / Cash Collections</p> <p><i>Notes: This task code includes time spent on dealing with the Debtors' requests for financing, most notably the financing sought by PRASA.</i></p>	<p>0</p>
<p>B231 Security Document Analysis</p> <p><i>Notes: This task code includes time spent on reviewing and analyzing security documents and results from lien searches.</i></p>	<p>0</p>

² The firm charges one-half a timekeeper's normal billing rate for any time incurred on account of non-working travel.

<p>B260 Meetings of and Communications with Debtors/Oversight Board</p> <p><i>Notes: This task code includes time spent on meeting and communicating with the Debtors, the Oversight Board, and their respective advisors. GJB anticipates significant collaboration with the Special Claims Committee of the FOMB on matters GJB has appears as conflicts counsel.</i></p>	<p>20</p>
<p>B261 Investigations</p>	<p>0</p>
<p>B310 Claims Administration and Objections</p> <p><i>Notes: This task code includes time spent on matters related to claims administration, including time spent on investigating potential challenges to claims, including, most notably, the challenge to the GO bond claims and the ERS bond claims. This task code also includes time spent on analyzing the pool of unsecured claims against the Debtors. GJB is role in this category is limited to instances, if any, where Paul Hastings may have a conflict.</i></p>	<p>10</p>
<p>B320 Plan and Disclosure Statement</p> <p><i>Notes: This task code includes time spent on matters related to a potential plan of adjustment for the title III Debtors. GJB will focus its participation on matters that impact its scope of work and avoid unnecessary duplication with Paul Hastings. Given the Oversight Board's recent filing of the Commonwealth plan of adjustment, GJB anticipates spending time familiarizing itself with matters that may impact litigation where GJB is serving as conflicts counsel to the Committee.</i></p>	<p>170</p>

B420 Restructurings	
<p><i>Notes: This task code includes time spent on general restructuring matters, including the PREPA RSA and the related 9019 motion.</i></p> <p><i>GJB anticipates continued involvement in the PREPA RSA 9019 dispute with respect to CITI and any other conflict situations, currently scheduled for hearing to commence in March 2020.</i></p>	
	35
TOTAL HOURS	611
TOTAL ESTIMATED FEE³	\$280,088.51
MINUS 20% REDUCTION	\$56,017.70
TOTAL ESTIMATED FEE (NET OF REDUCTION)	\$224,070.81

³ Assumes Blended Rate of \$458.41

**ADDITIONAL STAFFING PLANS (INCL. SUB-BUDGETS)
FOR MATTERS JOINTLY PURSUED BY OVERSIGHT BOARD AND COMMITTEE**

Period Covered: March 1, 2020 through March 31, 2020

A. Adversary Proceedings Against Financial Parties and Fuel Oil Defendants

Genovese Joblove & Battista PA., (“GJB” or “Firm”) as the Committee’s special litigation counsel, represents the Committee with respect to two separate adversary proceedings against: (a) numerous underwriters and other financial target parties involved in the issuance of Commonwealth bonds [Adv. Proc. No. 19-280-LTS]; and (b) the claims of PREPA against fuel oil suppliers and laboratories to avoid certain fraudulent transfers [Adv. Pro. No. 19-388-LTS] (which is not stayed).

The stay relating to Adv. Proc. No. 19-280 was set to expire in March 2020, but the proposed interim case management order submitted by the mediation team would continue that stay and such stay has been implemented on an interim basis.

This representation includes the evaluation and if warranted, litigation of, a lawsuit filed by certain monoline insurers to assert claims against the same defendants sued by the Committee in Adv. Proc. No. 19-280-LTS, which monoline suit has been removed to the PROMESA proceedings.

The litigation in Adv. Proc. No. 19-388-LTS has been stayed through June 2020 with certain court-imposed obligations prior to that time. Related litigation exists that must be evaluated and considered.

1. Staffing Plan

Category of timekeeper (using categories maintained by the firm)	Number of timekeepers expected to work on the matter during the budget period	Average hourly rate for period March 1, 2020 through March 31, 2020	Average hourly rate for period March 1, 2020 through March 31, 2020 (net of 20% reduction)
Partner (20+ Years)	2	\$680	\$544
Partner (10+ Years)	2	\$525	\$420
Associate	4	\$375	\$300
Paraprofessionals	2	\$195	\$156

2. Sub-Budget

U.S. Trustee Task Code and Project Category	Estimated Hours for Period March 1, 2020 through March 31, 2020
B191 General Litigation	125
TOTAL HOURS	125

B. Garden-Variety Avoidance Actions

GJB represents the Committee with respect to limited “garden-variety” avoidance actions [Adv. Proc. Nos. 19-267, 19-275-279]. Casillas, Santiago & Torres LLC, the Committee’s local counsel, represents the Committee with respect to the balance of the “garden-variety” avoidance actions initiated against vendors of the Commonwealth of Puerto Rico [Adv. Proc. Nos. 19-041 to 19-279, Adv. Proc. Nos. 19-347 to 19-354, and additional adversary proceedings to be commenced with respect to PREPA]. However, GJB may, from time-to-time, provide additional assistance to other committee counsel with respect to litigation matters within GJB’s subject matter expertise, but in no way duplicative of the work performed by other counsel on these matters.

1. Staffing Plan

Category of timekeeper (using categories maintained by the firm)	Number of timekeepers expected to work on the matter during the budget period	Average hourly rate for period March 1, 2020 through March 31, 2020	Average hourly rate for period March 1, 2020 through March 31, 2020 (net of 20% reduction)
Partner (20+ Years)	2	\$575	\$460
Partner (10+ Years)	2	\$500	\$400
Associate	2	\$375	\$300
Paraprofessionals	2	\$195	\$156

2. Sub-Budget

U.S. Trustee Task Code and Project Category	Estimated Hours for Period March 1, 2020 through March 31, 2020
B191 General Litigation	10
TOTAL HOURS	10

We also note that, on June 7, 2019, the Co-Plaintiffs in these avoidance actions filed a motion [Docket No. 7325] seeking approval of, among other things, procedures establishing a framework for streamlined execution of settlement agreements and procedures and guidelines for resolving the avoidance actions through a voluntary mediation process. On July 12, 2019, the Court entered an “*Order Granting Omnibus Motion by the Financial Oversight and Management Board for Puerto Rico, acting by and through the Members of the Special Claims Committee and the Official Committee of Unsecured Creditors to (i) Establish Litigation Case Management Procedures and (ii) Establish Procedures for Approval of Settlements.*” On December 6, 2019, the Court entered an “*Order Granting Omnibus Motion to Extend Deadlines in Order Granting Omnibus Motion by the Financial Oversight and Management Board for Puerto Rico, acting by and through the Members of the Special Claims Committee and the Official Committee of Unsecured Creditors to (i) Establish Litigation Case Management Procedures and (ii) Establish Procedures for Approval of Settlements.*” Accordingly, the Response Due Date was extended to April 13, 2020, the Motion to Dismiss Response Date was extended to May 13, 2020 and the Reply Deadline was extended to June 13, 2020. Accordingly, GJB anticipates that its workload with respect to “garden-variety” avoidance actions will be reduced.

C. Currently Stayed Co-Plaintiff Adversary Proceedings

Pursuant to Judge Swain’s Order at the July 24th, 2019, Omnibus Hearing (as subsequently modified), the Court extended the stayed, until December 29, 2019, several adversary proceedings for which the Committee has been appointed as Co-Plaintiff/Co-Trustee with the Oversight Board or the members of the Special Claims Committee. These matters remain stayed until March 11, 2020, while the parties work with the mediators on a process to resolve these adversary proceedings and other plan related matters. Pursuant to the most recent Amended Report and Recommendation a new Final Case Management Order for Revenue Bonds has been proposed that will govern the litigation of certain issues related to the Revenue Bond Complaints and thereby require monitoring and/or additional work.

- Eight adversary proceedings seeking to recover fraudulent transfers made on account of GO bonds that were not validly issued [Adv. Proc. No. 19-281, Adv. Proc. No. 19-282, Adv. Proc. No. 19-283, Adv. Proc. No. 19-284, Adv. Proc. No. 19-285, Adv. Proc. No. 19-286, Adv. Proc. No. 19-287, and Adv. Proc. No. 19-288]; and
- Four adversary proceedings challenging liens asserted by certain holders of HTA bonds [Adv. Proc. No. 19-362, Adv. Proc. No. 19-363, Adv. Proc. No. 19-364,

and Adv. Proc. No. 19-365] (“Revenue Bond Complaints”).

Accordingly, GJB does not expect to expend any significant time on these adversary proceedings during the month of March other than minor administrative and/or procedural work, including responding to inquiries from defendants and assisting Brown Rudnick and Proskauer, in general administration of these cases.

Also, on December 19, 2019, Judge Swain approved a briefing and hearing schedule with respect to motion to dismiss practice related to the GO Lien Challenge. According to that schedule, the GO bondholders’ motions to dismiss were due on March 5, 2020, and the objectors’ briefs are due on April 3, 2020. GJB’s involvement in the GO Lien Challenge is limited to one adversary listed below.

- One adversary proceeding challenging liens asserted by certain holders of GO bonds Adv. Proc. No. 19-297].

Accordingly, GJB’s involvement in the GO Lien Challenge is expected to be minimal. The mediation team has recommended that the Court stay the GO Lien Challenge pending a decision on confirmation of the Commonwealth plan of adjustment. The budget and staffing plan below reflects the impact of the Amended Report and Recommendation of the Mediation Team.

1. Staffing Plan

Category of timekeeper (using categories maintained by the firm)	Number of timekeepers expected to work on the matter during the budget period	Average hourly rate for period March 1, 2020 through March 31, 2020	Average hourly rate for period March 1, 2020 through March 31, 2020 (net of 20% reduction)
Partner (20+ Years)	2	\$575	\$460
Partner (10+ Years)	2	\$500	\$400
Associate	2	\$375	\$300
Paraprofessionals	2	\$195	\$156

2. Sub-Budget

U.S. Trustee Task Code and Project Category	Estimated Hours for Period March 1, 2020 through March 31, 2020
B191 General Litigation	10

TOTAL HOURS	10
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D. ERS Lien Co-Plaintiff Adversary Proceedings

Proskauer Rose LLP, as counsel to the Oversight Board, has primary responsibility for the adversary proceedings seeking declarations on the scope of the liens purportedly securing the ERS bonds [Adv. Proc. No. 19-366 and Adv. Proc. No. 19-367]. GJB is counsel of record for the Committee in Adv. Proc. No. 19-367. These matters had been stayed pursuant to the July 25th, 2019 Order, but on October 24, 2019, the Court approved a scheduling order regarding discovery and summary judgment briefing on the lien scope issues and *ultra vires* issues with respect to the ERS bonds and lifted the stay. Accordingly, (a) the lien scope litigation, *i.e.*, Adv. Proc. No. 19-366 and Adv. Proc. No. 19-367 and (b) Count I of the complaints seeking to recover fraudulent transfers made on account of ERS bonds that were not validly issued, *i.e.*, Adv. Proc. No. 19-355, Adv. Proc. No. 19-356, Adv. Proc. No. 19-357, Adv. Proc. No. 19-358, Adv. Proc. No. 19-359, and Adv. Proc. No. 19-361, were unstayed. GJB's involvement in the lien scope litigation is expected to be minimal and limited to Adv. Proc. No. 19-367.

In connection with the *ultra vires* objection to the ERS Bonds, GJB anticipates it will continue to be involved in certain discovery and briefing issues on a limited basis during the month of March.

1. Staffing Plan

Category of timekeeper (using categories maintained by the firm)	Number of timekeepers expected to work on the matter during the budget period	Average hourly rate for period March 1, 2020 through March 31, 2020	Average hourly rate for period March 1, 2020 through March 31, 2020 (net of 20% reduction)
Partner (20+ Years)	2	\$575	\$460
Partner (10+ Years)	2	\$500	\$400
Associate	2	\$375	\$300
Paraprofessionals	2	\$195	\$156

2. Sub-Budget

U.S. Trustee Task Code and Project Category	Estimated Hours for Period March 1, 2020 through March 31, 2020
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B191 General Litigation	5
TOTAL HOURS	5

E. Contested Matters.

GJB represents the Committee with respect to several issues, including the following: the Adversary Defendants motion to participate in the GO Bond Claim Objections (and related mediation process); PREPA 9019 Motion relating to the RSA; and anticipated, litigated contested matters that are currently under advisement by the Committee. GJB anticipates its involvement in the PREPA 9019; GO/PBA Bondholder restructuring deal and amended Plan of Adjustment for the Commonwealth will increase during the month of March as detail review and consideration is given to the impact the New PSA and Amended Plan has on pending litigation.

1. Staffing Plan

Category of timekeeper (using categories maintained by the firm)	Number of timekeepers expected to work on the matter during the budget period	Average hourly rate for period March 1, 2020 through March 31, 2020	Average hourly rate for period March 1, 2020 through March 31, 2020 (net of 20% reduction)
Partner (20+ Years)	3	\$645	\$516
Partner (10+ Years)	2	\$525	\$420
Associate	4	\$375	\$300
Paraprofessionals	2	\$195	\$156

2. Sub-Budget

U.S. Trustee Task Code and Project Category	Estimated Hours for Period March 1, 2020 through March 31, 2020
B190 Other Contested Matters	50
TOTAL HOURS	50

GENERAL STAFFING PLAN

Period Covered: March 1, 2020 through March 31, 2020⁴

Category of timekeeper (using categories maintained by the firm)	Number of timekeepers expected to work on the matter during the budget period	Average hourly rate for period March 1, 2020 through March 31, 2020	Average hourly rate for period March 1, 2020 through March 31, 2020 (net of 20% reduction)
Partner (20+ Years)	5	\$615	\$492
Partner (10+ Years)	2	\$525	\$420
Associate	4	\$375	\$300
Paraprofessionals	2	\$195	\$156

⁴ Unless otherwise indicated in this budget, this proposed staffing plan is based on the following assumptions: (i) no additional title III cases or adversary proceedings will be commenced during the budget period; (ii) no plan of adjustment will be filed during the budget period; (iii) no adversary proceedings will require discovery and trial preparation; and (iv) all adversary proceedings in which the Committee has intervened and/or sought to intervene will only involve briefing and hearings on motions to dismiss and/or pretrial proceedings. In addition, it is impossible to predict how many hours will be required to prosecute contested matters where GJB is asked to participate as conflicts counsel. Thus, this proposed budget may be materially different from the work actually performed. For instance, discovery disputes may lead to extensive litigation. Similarly, the Committee may need to respond to motions that are not and cannot be anticipated. At this time, the proposed budget is speculative. The proposed amended budget has been revised to account for the stay of litigation and other proceedings.

Case Name and Number: 17 BK 3283-LTS (Jointly Administered)
 Applicant's Name: Genovese, Joblove & Battista, P.A., as Special Litigation Counsel to the Official Committee Of Unsecured Creditors Of The Commonwealth Of Puerto Rico, *et al.*

BUDGET 1

Period Covered: April 1, 2020 through April 30, 2020²

U.S. Trustee Task Code and Project Category	Estimated Hours for Period April 1, 2020 through April 30, 2020
B110 Case Administration <i>Notes: This task code includes general case strategy and planning, case management, internal Committee matters, internal meetings, and meetings with Paul Hastings.</i>	40
B112 General Creditor Inquiries <i>Notes: This task code includes responding to and addressing questions and inquiries from creditors.</i>	2

¹ This budget may be substantially impacted by worldwide conditions resulting from the Coronavirus pandemic, which may include adjournments, continuances, and stays of legal proceedings. This budget assumes an adjournment on the Disclosure Statement hearings and related proceedings.

² Unless otherwise indicated, this proposed budget is based on the following assumptions: (i) no additional title III cases or adversary proceedings will be commenced during the budget period; (ii) no new plan of adjustment will be filed during the budget period; (iii) no adversary proceedings will require discovery and trial preparation; and (iv) all adversary proceedings in which the Committee has intervened and/or sought to intervene will only involve briefing and hearings on motions to dismiss, motions to stay, and/or pretrial proceedings. In addition, it is impossible to predict how many hours will be required to prosecute contested matters where GJB is asked to participate as conflicts counsel. Thus, this proposed budget may be materially different from the work actually performed. For instance, discovery disputes may lead to extensive litigation. Similarly, the Committee may need to respond to motions that are not and cannot be anticipated. At this time, the proposed budget is speculative. The proposed budget has been revised to account for the March 10, 2020 Final Order Regarding (A) Stay Period, (B) Mandatory Mediation, and (c) Certain Deadlines Related Thereto, with regard to several adversary proceedings for which the Committee has been appointed as co-plaintiff/co-trustee with the Oversight Board or the members of the Special Claims Committee, as well as the rescheduled PREPA RSA 9019 hearing..

<p>B113 Pleadings Review</p> <p><i>Notes: This task code includes review of relevant pleadings in the title III cases as well as all related adversary proceedings. GJB will focus its review on matters that impact its scope of work.</i></p>	<p>30</p>
<p>B120 Asset Analysis and Recovery</p> <p><i>Notes: This task code includes review and analysis of the Debtors' assets, including proceeds from insurance policies.</i></p>	<p>0</p>
<p>B130 Asset Disposition</p> <p><i>Notes: This task code includes work related to the Debtors' efforts to sell or otherwise dispose of their assets.</i></p>	<p>0</p>
<p>B140 Relief from Stay / Adequate Protection Proceedings</p> <p><i>Notes: This task code includes work related to motions for relief from stay, including the stay relief motion filed by the ERS bondholders and the receiver motion filed by the PREPA bondholders. GJB is not taking an active role on stay relief requests and its role in this category is limited to instances, if any, where Paul Hastings may have a conflict.</i></p>	<p>0</p>
<p>B150 Meetings of Creditors' Committee and Communications with Creditors</p> <p><i>Notes: This task code includes time spent on telephone conferences, meetings, and other communications with the Committee, including preparation for such calls and meetings. GJB will focus its participation on matters that impact its scope of work and avoid unnecessary duplication with Paul Hastings.</i></p>	<p>25</p>

<p>B155 Court Hearings</p> <p><i>Notes: This task codes includes time spent in court hearings in the title III cases and the related adversary proceedings. This task code also includes time spent preparing for such hearings. GJB will focus its participation on matters that impact its scope of work and avoid unnecessary duplication with Paul Hastings and the Special Claims Committee.</i></p>	5
<p>B160 Employment / Fee Applications</p> <p><i>Notes: This task code includes time spent on complying with the interim compensation order, including preparing GJB's fee statements, as well as responding to inquiries from the fee examiner related thereto.</i></p>	20
<p>B161 Budgeting (Case)</p> <p><i>Notes: This task code includes time spent on preparing GJB's monthly budgets, as required by the fee examiner.</i></p>	5
<p>B165 Fee and Employment Applications of Other Professionals</p> <p><i>Notes: This task code includes time spent on reviewing fee and retention applications of other professionals in these title III cases only as it relates to (i) committee professionals operating at the direction of GJB as conflicts counsel; or (ii) where matters principally handled by GJB are implicated.</i></p>	2
<p>B170 Fee and Employment Objections</p> <p><i>Notes: This task code includes time spent on preparing or responding to objections to fee and retention applications.</i></p>	10

<p>B180 Avoidance Action Analysis</p> <p><i>Notes: This task code includes time spent on analyzing potential claims for avoidance, including preferential transfers and fraudulent transfers. GJB will focus its participation on matters that impact its scope of work and avoid unnecessary duplication with Paul Hastings or other counsel handling such matters for the Committee or the Special Claims Committee, to the extent it is a Co-Plaintiff.</i></p>	<p>10</p>
<p>B185 Assumption / Rejection of Leases and Contracts</p> <p><i>Notes: This task code includes time spent on analyzing issues related to the assumption or rejection of executory contracts and unexpired leases. GJB is role in this category is limited to instances, if any, where Paul Hastings may have a conflict.</i></p>	<p>0</p>
<p>B190 Other Contested Matters</p> <p><i>Notes: This task code includes time spent on all contested matters in the title III cases. GJB's role in this category is limited to instances, if any, where Paul Hastings may have a conflict. GJB anticipates potential main case litigation concerning matters where Paul Hastings has identified conflicts with parties that may become potentially adverse to the Committee. Further, adverse and interested parties to litigation initiated by GJB on behalf of the Committee have sought to participate in main case issues, including claims objections. Currently, the disputes in which GJB has primary responsibility are limited in scope due to the stay orders in effect. GJB anticipates primary responsibility for 9019 dispute regarding an adversary defendant and other anticipated disputes arising from confirmation-related issues, which would be a potentially heavily litigated matters.</i></p>	<p>100</p>

191 General Litigation (including Commonwealth litigation, mediation process, and handling of adversary proceedings)

Notes: This task code includes time spent on litigation matters, including all adversary proceedings. We anticipate that work under this task code will include (a) the joint prosecution of causes of action together with Oversight Board/Special Claims Committee in 22 separate lawsuits, and (b) monitoring other adversary proceedings and litigation. GJB's role in this category is limited to those adversary proceedings in which GJB has appeared as and is the lead counsel for the Committee. This role may require coordination with other counsel in related matters concerning global legal issues. Currently, many of these matters are stayed pending confirmation pursuant to Court orders in effect.

GJB anticipates primary responsibility regarding an adversary proceeding removed to the PROMESA court regarding monoline insurers' claims against underwriter defendants.

GJB anticipates continued briefing relating to motion practice relating to pending adversary proceedings and continued discovery as to limited issues excepted from the Stay or pursuant to the March 10, 2020 Final Order Regarding (A) Stay Period, (B) Mandatory Mediation, and (c) Certain Deadlines Related Thereto

GJB anticipates a the expiration of the limited stay of litigation on behalf of PREPA regarding fuel oil claims, which also includes the motion practice relating to the class action plaintiffs' effort to intervene. During the stay period, GJB anticipates preparing for post-stay litigation and discovery. Certain Fuel Oil-related litigation is not stayed, and may be subject to briefing at the Committee's discretion.

GJB anticipates continued prosecution of causes of action with the Oversight Board/Special Claims Committee regarding any conflicts regarding prosecution of the ERS lien challenges as modified by the ERS Scheduling Order.

175

<p>B195 Non-Working Travel³</p> <p><i>Notes: This task code includes time spent on non-working travel, including to court hearings and Committee meetings in San Juan, Boston and New York City, although attendance will be limited if required due to a conflict on behalf of Paul Hastings.</i></p>	0
<p>B210 Debtors' Financial Information and Operations/Fiscal Plan</p> <p><i>Notes: This task code includes time spent reviewing and analyzing the Debtors' fiscal plans and related matters. GJB is role in this category is limited to instances, if any, where Paul Hastings may have a conflict or where GJB may need to familiarize itself with matters that may impact litigation where GJB is serving as conflicts counsel to the Committee.</i></p>	10
<p>B220 Employee Benefits/Pensions</p> <p><i>Notes: This task code includes time spent reviewing and analyzing matters related to retiree benefit claims.</i></p>	0
<p>B230 Financing / Cash Collections</p> <p><i>Notes: This task code includes time spent on dealing with the Debtors' requests for financing, most notably the financing sought by PRASA.</i></p>	0
<p>B231 Security Document Analysis</p> <p><i>Notes: This task code includes time spent on reviewing and analyzing security documents and results from lien searches.</i></p>	0

³ The firm charges one-half a timekeeper's normal billing rate for any time incurred on account of non-working travel.

<p>B260 Meetings of and Communications with Debtors/Oversight Board</p> <p><i>Notes: This task code includes time spent on meeting and communicating with the Debtors, the Oversight Board, and their respective advisors. GJB anticipates significant collaboration with the Special Claims Committee of the FOMB on matters GJB has appears as conflicts counsel.</i></p>	<p>20</p>
<p>B261 Investigations</p>	<p>0</p>
<p>B310 Claims Administration and Objections</p> <p><i>Notes: This task code includes time spent on matters related to claims administration, including time spent on investigating potential challenges to claims, including, most notably, the challenge to the GO bond claims and the ERS bond claims. This task code also includes time spent on analyzing the pool of unsecured claims against the Debtors. GJB is role in this category is limited to instances, if any, where Paul Hastings may have a conflict.</i></p>	<p>10</p>
<p>B320 Plan and Disclosure Statement</p> <p><i>Notes: This task code includes time spent on matters related to a potential plan of adjustment for the title III Debtors. GJB will focus its participation on matters that impact its scope of work and avoid unnecessary duplication with Paul Hastings. Given the Oversight Board's recent filing of the Commonwealth amended plan of adjustment and disclosure statement, GJB anticipates spending time familiarizing itself with matters that may impact litigation where GJB is serving as conflicts counsel to the Committee.</i></p>	<p>80</p>

B420 Restructurings	
<p><i>Notes: This task code includes time spent on general restructuring matters, including the Commonwealth Amended Plan of Adjustment and Disclosure Statement, and PREPA RSA and the related 9019 motion.</i></p> <p><i>GJB anticipates continued involvement in the these matters to the extent that Paul Hastings is conflicted from the representation</i></p>	
	20
TOTAL HOURS	564
TOTAL ESTIMATED FEE⁴	\$258,543.24
MINUS 20% REDUCTION	\$51,708.65
TOTAL ESTIMATED FEE (NET OF REDUCTION)	\$206,834.59

⁴ Assumes Blended Rate of \$458.41

**ADDITIONAL STAFFING PLANS (INCL. SUB-BUDGETS)
FOR MATTERS JOINTLY PURSUED BY OVERSIGHT BOARD AND COMMITTEE**

Period Covered: April 1, 2020 through April 30, 2020

A. Adversary Proceedings Against Financial Parties, Fuel Oil Defendants, and Other Proceedings

Genovese Joblove & Battista PA., (“GJB” or “Firm”) as the Committee’s special litigation counsel, represents the Committee with respect to two (2) separate adversary proceedings against: (a) numerous underwriters and other financial target parties involved in the issuance of Commonwealth bonds [Adv. Proc. No. 19-280-LTS]; and (b) the claims of PREPA against fuel oil suppliers and laboratories to avoid certain fraudulent transfers [Adv. Pro. No. 19-388-LTS].

Pursuant to the Order entered on December 10, 2019, the litigation in Adv. Proc. No. 19-00388 has been stayed through June 30, 2020 with certain court-imposed obligations prior to that time. The Parties must meet and confer and provide the Court with a detailed Joint Status Report compliant with the below specifications by May 12, 2020. GJB will be involved in this process as appropriate. These proceedings are not subject to the Stay Order. Related litigation exists that must be evaluated and considered.

The stay relating to Adv. Proc. No. 19-280 was set to expire in April 2020, but the March 10, 2020 *Final Order Regarding (A) Stay Period, (B) Mandatory Mediation, and (c) Certain Deadlines Related Thereto* stays the proceedings pending a decision on confirmation. GJB is also involved in the evaluation and if warranted, litigation of, a lawsuit filed by certain monoline insurers to assert claims against the same defendants sued by the Committee in Adv. Proc. No. 19-280-LTS, which monoline suit has been removed to the PROMESA proceedings.

The Firm is reviewing and analyzing additional issues regarding settling bondholders that may result in litigation arising from anticipated confirmation issues.

1. Staffing Plan

Category of timekeeper (using categories maintained by the firm)	Number of timekeepers expected to work on the matter during the budget period	Average hourly rate for period April 1, 2020 through April 30, 2020	Average hourly rate for period April 1, 2020 through April 30, 2020 (net of 20% reduction)
Partner (20+ Years)	2	\$680	\$544
Partner (10+ Years)	2	\$525	\$420
Associate	4	\$375	\$300

Paraprofessionals	2	\$195	\$156
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2. Sub-Budget

U.S. Trustee Task Code and Project Category	Estimated Hours for Period April 1, 2020 through April 30, 2020
B191 General Litigation	150
TOTAL HOURS	150

B. Garden-Variety Avoidance Actions

GJB represents the Committee with respect to limited “garden-variety” avoidance actions [Adv. Proc. Nos. 19-267, 19-275-279] against entities that received preferential and fraudulent transfers before the petition date. Casillas, Santiago & Torres LLC, the Committee’s local counsel, represents the Committee with respect to the balance of the “garden-variety” avoidance actions initiated against vendors of the Commonwealth of Puerto Rico [Adv. Proc. Nos. 19-041 to 19-279, Adv. Proc. Nos. 19-347 to 19-354, and additional adversary proceedings to be commenced with respect to PREPA]. However, GJB may, from time-to-time, provide additional assistance to other committee counsel with respect to litigation matters within GJB’s subject matter expertise, but in no way duplicative of the work performed by other counsel on these matters.

On June 7, 2019, the Co-Plaintiffs in these avoidance actions filed a motion [Docket No. 7325] seeking approval of, among other things, procedures establishing a framework for streamlined execution of settlement agreements and procedures and guidelines for resolving the avoidance actions through a voluntary mediation process. On July 12, 2019, the Court entered an “*Order Granting Omnibus Motion by the Financial Oversight and Management Board for Puerto Rico, acting by and through the Members of the Special Claims Committee and the Official Committee of Unsecured Creditors to (i) Establish Litigation Case Management Procedures and (ii) Establish Procedures for Approval of Settlements.*” On December 6, 2019, the Court entered an “*Order Granting Omnibus Motion to Extend Deadlines in Order Granting Omnibus Motion by the Financial Oversight and Management Board for Puerto Rico, acting by and through the Members of the Special Claims Committee and the Official Committee of Unsecured Creditors to (i) Establish Litigation Case Management Procedures and (ii) Establish Procedures for Approval of Settlements.*” Accordingly, the Response Due Date was extended to April 13, 2020, the Motion to Dismiss Response Date was extended to May 13, 2020 and the Reply Deadline was extended to June 13, 2020. Accordingly, GJB anticipates that its workload with respect to “garden-variety” avoidance actions will be reduced.

1. Staffing Plan

Category of	Number of	Average hourly	Average hourly
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timekeeper (using categories maintained by the firm)	timekeepers expected to work on the matter during the budget period	rate for period April 1, 2020 through April 30, 2020	rate for period April 1, 2020 through April 30, 2020 (net of 20% reduction)
Partner (20+ Years)	2	\$575	\$460
Partner (10+ Years)	2	\$500	\$400
Associate	2	\$375	\$300
Paraprofessionals	2	\$195	\$156

2. Sub-Budget

U.S. Trustee Task Code and Project Category	Estimated Hours for Period April 1, 2020 through April 30, 2020
B191 General Litigation	10
TOTAL HOURS	10

We also note that, on June 7, 2019, the Co-Plaintiffs in these avoidance actions filed a motion [Docket No. 7325] seeking approval of, among other things, procedures establishing a framework for streamlined execution of settlement agreements and procedures and guidelines for resolving the avoidance actions through a voluntary mediation process. On July 12, 2019, the Court entered an “*Order Granting Omnibus Motion by the Financial Oversight and Management Board for Puerto Rico, acting by and through the Members of the Special Claims Committee and the Official Committee of Unsecured Creditors to (i) Establish Litigation Case Management Procedures and (ii) Establish Procedures for Approval of Settlements.*” On December 6, 2019, the Court entered an “*Order Granting Omnibus Motion to Extend Deadlines in Order Granting Omnibus Motion by the Financial Oversight and Management Board for Puerto Rico, acting by and through the Members of the Special Claims Committee and the Official Committee of Unsecured Creditors to (i) Establish Litigation Case Management Procedures and (ii) Establish Procedures for Approval of Settlements.*” Accordingly, the Response Due Date was extended to April 13, 2020, the Motion to Dismiss Response Date was extended to May 13, 2020 and the Reply Deadline was extended to June 13, 2020. Accordingly, GJB anticipates that its workload with respect to “garden-variety” avoidance actions will be reduced.

C. Currently Stayed Co-Plaintiff Adversary Proceedings

The Committee has been appointed as Co-Plaintiff/Co-Trustee with the Oversight Board or the members of the Special Claims Committee as to certain Adversary Proceedings. GJB represents the Committee as Special Litigation counsel in a subset of these adversary proceedings. Pursuant to the March 10, 2020 Final Order Regarding (A) Stay Period, (B) Mandatory

Mediation, and (c) Certain Deadlines Related Thereto the Court extended the stay. These matters are identified as follows:

- Four adversary proceedings seeking, among other things, declaratory judgments that the pertinent challenged GO bonds were issued in violation of the Constitution of Puerto Rico and to recover fraudulent transfers made on account of GO bonds that were not validly issued [Adv. Proc. No. 19-281, Adv. Proc. No. 19-282, Adv. Proc. No. 19-283, and Adv. Proc. No. 19-288]. These matters are stayed pending the decision on the Confirmation of the Amended Plan of Adjustment; and
- One adversary proceedings challenging liens asserted by certain holders of HTA bonds [Adv. Proc. No. 19-364]. These matters remain stayed until such time as the Court orders the stay lifted or a plan of adjustment is confirmed for HTA.

Accordingly, GJB does not expect to expend any significant time on these adversary proceedings during the month of April other than minor administrative and/or procedural work, including responding to inquiries from defendants and assisting Brown Rudnick and Proskauer, in general administration of these cases.

Also, on December 19, 2019, Judge Swain approved a briefing and hearing schedule with respect to motion to dismiss practice related to the GO Lien Challenge. This was stayed pending confirmation of the Amended Plan, pursuant to March 10, 2020 *Final Order Regarding (A) Stay Period, (B) Mandatory Mediation, and (c) Certain Deadlines Related Thereto*. GJB's involvement in the GO Lien Challenge is limited to one adversary listed below.

- One adversary proceeding challenging liens asserted by certain holders of GO bonds Adv. Proc. No. 19-297].

GJB's involvement in the GO Lien Challenge is expected to be minimal.

1. Staffing Plan

Category of timekeeper (using categories maintained by the firm)	Number of timekeepers expected to work on the matter during the budget period	Average hourly rate for period April 1, 2020 through April 30, 2020	Average hourly rate for period April 1, 2020 through April 30, 2020 (net of 20% reduction)
Partner (20+ Years)	2	\$575	\$460
Partner (10+ Years)	2	\$500	\$400
Associate	2	\$375	\$300

Paraprofessionals	2	\$195	\$156
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2. Sub-Budget

U.S. Trustee Task Code and Project Category	Estimated Hours for Period April 1, 2020 through April 30, 2020
B191 General Litigation	10
TOTAL HOURS	10

D. ERS Lien Co-Plaintiff Adversary Proceedings

Proskauer Rose LLP, as counsel to the Oversight Board, has primary responsibility for the adversary proceedings seeking, among other things, declarations on the scope of the liens purportedly securing the ERS bonds [Adv. Proc. No. 19-366 and Adv. Proc. No. 19-367]. GJB is counsel of record for the Committee in Adv. Proc. No. 19-367. These matters had been stayed pursuant to the July 25th, 2019 Order, but on October 24, 2019, the Court approved a scheduling order regarding discovery and summary judgment briefing on the lien scope issues and *ultra vires* issues with respect to the ERS bonds and lifted the stay. Accordingly, (a) the lien scope litigation, *i.e.*, Adv. Proc. No. 19-366 and Adv. Proc. No. 19-367 and (b) Count I of the complaints seeking declarations that the pertinent ERS bonds were issued *ultra vires* and, thus, are null and void, *i.e.*, Adv. Proc. No. 19-355, Adv. Proc. No. 19-356, Adv. Proc. No. 19-357, Adv. Proc. No. 19-359, and Adv. Proc. No. 19-361 were unstayed. GJB's involvement in the lien scope litigation is expected to be minimal and limited to Adv. Proc. No. 19-367.

In connection with the *ultra vires* objection to the ERS Bonds, GJB anticipates it will continue to be involved in certain discovery and briefing issues on a limited basis during the month of April.

1. Staffing Plan

Category of timekeeper (using categories maintained by the firm)	Number of timekeepers expected to work on the matter during the budget period	Average hourly rate for period April 1, 2020 through April 30, 2020	Average hourly rate for period April 1, 2020 through April 30, 2020 (net of 20% reduction)
Partner (20+ Years)	2	\$575	\$460
Partner (10+ Years)	2	\$500	\$400
Associate	2	\$375	\$300
Paraprofessionals	2	\$195	\$156

2. Sub-Budget

U.S. Trustee Task Code and Project Category	Estimated Hours for Period April 1, 2020 through April 30, 2020
B191 General Litigation	5
TOTAL HOURS	5

E. Contested Matters.

GJB represents the Committee with respect to several issues, including the following: the Adversary Defendants motion to participate in the GO Bond Claim Objections (and related mediation process); PREPA 9019 Motion relating to the RSA; and anticipated, litigated contested matters that are currently under advisement by the Committee. GJB anticipates its involvement in the PREPA 9019; GO/PBA Bondholder restructuring deal and amended Plan of Adjustment for the Commonwealth will increase during the month of April as detail review and consideration is given to the impact the New PSA and Amended Plan has on pending litigation.

1. Staffing Plan

Category of timekeeper (using categories maintained by the firm)	Number of timekeepers expected to work on the matter during the budget period	Average hourly rate for period April 1, 2020 through April 30, 2020	Average hourly rate for period April 1, 2020 through April 30, 2020 (net of 20% reduction)
Partner (20+ Years)	3	\$645	\$516
Partner (10+ Years)	2	\$525	\$420
Associate	4	\$375	\$300
Paraprofessionals	2	\$195	\$156

2. Sub-Budget

U.S. Trustee Task Code and Project Category	Estimated Hours for Period April 1, 2020 through April 30, 2020
B190 Other Contested Matters	100
TOTAL HOURS	100

GENERAL STAFFING PLAN

Period Covered: April 1, 2020 through April 30, 2020⁵

Category of timekeeper (using categories maintained by the firm)	Number of timekeepers expected to work on the matter during the budget period	Average hourly rate for period April 1, 2020 through April 30, 2020	Average hourly rate for period April 1, 2020 through April 30, 2020 (net of 20% reduction)
Partner (20+ Years)	5	\$615	\$492
Partner (10+ Years)	2	\$525	\$420
Associate	4	\$375	\$300
Paraprofessionals	2	\$195	\$156

⁵ Unless otherwise indicated in this budget, this proposed staffing plan is based on the following assumptions: (i) no additional title III cases or adversary proceedings will be commenced during the budget period; (ii) no plan of adjustment will be filed during the budget period; (iii) no adversary proceedings will require discovery and trial preparation; and (iv) all adversary proceedings in which the Committee has intervened and/or sought to intervene will only involve briefing and hearings on motions to dismiss and/or pretrial proceedings. In addition, it is impossible to predict how many hours will be required to prosecute contested matters where GJB is asked to participate as conflicts counsel. Thus, this proposed budget may be materially different from the work actually performed. For instance, discovery disputes may lead to extensive litigation. Similarly, the Committee may need to respond to motions that are not and cannot be anticipated. At this time, the proposed budget is speculative. The proposed amended budget has been revised to account for the stay of litigation and other proceedings.

Case Name and Number: 17 BK 3283-LTS (Jointly Administered)
Applicant's Name: Genovese, Joblove & Battista, P.A., as Special Litigation Counsel
to the Official Committee Of Unsecured Creditors
Of The Commonwealth Of Puerto Rico, *et al.*

BUDGET 1

Period Covered: May 1, 2020 through May 31, 2020²

U.S. Trustee Task Code and Project Category	Estimated Hours for Period May 1, 2020 through May 31, 2020
B110 Case Administration <i>Notes: This task code includes general case strategy and planning, case management, internal Committee matters, internal meetings, and meetings with Paul Hastings.</i>	35
B112 General Creditor Inquiries <i>Notes: This task code includes responding to and addressing questions and inquiries from creditors.</i>	2

¹ This budget may be substantially impacted by worldwide conditions resulting from the Coronavirus pandemic, which may include adjournments, continuances, and stays of legal proceedings. This budget assumes an adjournment on the Disclosure Statement hearings and related proceedings.

² Unless otherwise indicated, this proposed budget is based on the following assumptions: (i) no additional title III cases or adversary proceedings will be commenced during the budget period; (ii) no new plan of adjustment will be filed during the budget period; (iii) no adversary proceedings will require discovery and trial preparation; and (iv) all adversary proceedings in which the Committee has intervened and/or sought to intervene will only involve briefing and hearings on motions to dismiss, motions to stay, and/or pretrial proceedings. In addition, it is impossible to predict how many hours will be required to prosecute contested matters where GJB is asked to participate as conflicts counsel. Thus, this proposed budget may be materially different from the work actually performed. For instance, discovery disputes may lead to extensive litigation. Similarly, the Committee may need to respond to motions that are not and cannot be anticipated. At this time, the proposed budget is speculative. The proposed budget has been revised to account for the March 10, 2020 Final Order Regarding (A) Stay Period, (B) Mandatory Mediation, and (c) Certain Deadlines Related Thereto, with regard to several adversary proceedings for which the Committee has been appointed as co-plaintiff/co-trustee with the Oversight Board or the members of the Special Claims Committee, as well as the rescheduled PREPA RSA 9019 hearing.

<p>B113 Pleadings Review</p> <p><i>Notes: This task code includes review of relevant pleadings in the title III cases as well as all related adversary proceedings. GJB will focus its review on matters that impact its scope of work.</i></p>	<p>25</p>
<p>B120 Asset Analysis and Recovery</p> <p><i>Notes: This task code includes review and analysis of the Debtors' assets, including proceeds from insurance policies.</i></p>	<p>0</p>
<p>B130 Asset Disposition</p> <p><i>Notes: This task code includes work related to the Debtors' efforts to sell or otherwise dispose of their assets.</i></p>	<p>0</p>
<p>B140 Relief from Stay / Adequate Protection Proceedings</p> <p><i>Notes: This task code includes work related to motions for relief from stay, including the stay relief motion filed by the ERS bondholders and the receiver motion filed by the PREPA bondholders. GJB is not taking an active role on stay relief requests and its role in this category is limited to instances, if any, where Paul Hastings may have a conflict.</i></p>	<p>0</p>
<p>B150 Meetings of Creditors' Committee and Communications with Creditors</p> <p><i>Notes: This task code includes time spent on telephone conferences, meetings, and other communications with the Committee, including preparation for such calls and meetings. GJB will focus its participation on matters that impact its scope of work and avoid unnecessary duplication with Paul Hastings.</i></p>	<p>20</p>

<p>B155 Court Hearings</p> <p><i>Notes: This task codes includes time spent in court hearings in the title III cases and the related adversary proceedings. This task code also includes time spent preparing for such hearings. GJB will focus its participation on matters that impact its scope of work and avoid unnecessary duplication with Paul Hastings and the Special Claims Committee.</i></p>	5
<p>B160 Employment / Fee Applications</p> <p><i>Notes: This task code includes time spent on complying with the interim compensation order, including preparing GJB's fee statements, as well as responding to inquiries from the fee examiner related thereto.</i></p>	20
<p>B161 Budgeting (Case)</p> <p><i>Notes: This task code includes time spent on preparing GJB's monthly budgets, as required by the fee examiner.</i></p>	5
<p>B165 Fee and Employment Applications of Other Professionals</p> <p><i>Notes: This task code includes time spent on reviewing fee and retention applications of other professionals in these title III cases only as it relates to (i) committee professionals operating at the direction of GJB as conflicts counsel; or (ii) where matters principally handled by GJB are implicated.</i></p>	2
<p>B170 Fee and Employment Objections</p> <p><i>Notes: This task code includes time spent on preparing or responding to objections to fee and retention applications.</i></p>	10

<p>B180 Avoidance Action Analysis</p> <p><i>Notes: This task code includes time spent on analyzing potential claims for avoidance, including preferential transfers and fraudulent transfers. GJB will focus its participation on matters that impact its scope of work and avoid unnecessary duplication with Paul Hastings or other counsel handling such matters for the Committee or the Special Claims Committee, to the extent it is a Co-Plaintiff.</i></p>	<p>10</p>
<p>B185 Assumption / Rejection of Leases and Contracts</p> <p><i>Notes: This task code includes time spent on analyzing issues related to the assumption or rejection of executory contracts and unexpired leases. GJB is role in this category is limited to instances, if any, where Paul Hastings may have a conflict.</i></p>	<p>0</p>
<p>B190 Other Contested Matters</p> <p><i>Notes: This task code includes time spent on all contested matters in the title III cases. GJB's role in this category is limited to instances, if any, where Paul Hastings may have a conflict. GJB anticipates potential main case litigation concerning matters where Paul Hastings has identified conflicts with parties that may become potentially adverse to the Committee. Further, adverse and interested parties to litigation initiated by GJB on behalf of the Committee have sought to participate in main case issues, including claims objections. Currently, the disputes in which GJB has primary responsibility are limited in scope due to the stay orders in effect. GJB anticipates primary responsibility for 9019 dispute regarding an adversary defendant and other anticipated disputes arising from confirmation-related issues, which would be a potentially heavily litigated matters.</i></p>	<p>70</p>

191 General Litigation (including Commonwealth litigation, mediation process, and handling of adversary proceedings)

Notes: This task code includes time spent on litigation matters, including all adversary proceedings. We anticipate that work under this task code will include (a) the joint prosecution of causes of action together with Oversight Board/Special Claims Committee in 22 separate lawsuits, and (b) monitoring other adversary proceedings and litigation. GJB's role in this category is limited to those adversary proceedings in which GJB has appeared as and is the lead counsel for the Committee. This role may require coordination with other counsel in related matters concerning global legal issues. Currently, many of these matters are stayed pending confirmation pursuant to Court orders in effect.

GJB anticipates primary responsibility regarding an adversary proceeding removed to the PROMESA court regarding monoline insurers' claims against underwriter defendants.

GJB anticipates continued briefing relating to motion practice relating to pending adversary proceedings and continued discovery as to limited issues excepted from the Stay or pursuant to the March 10, 2020 Final Order Regarding (A) Stay Period, (B) Mandatory Mediation, and (c) Certain Deadlines Related Thereto

GJB anticipates a the expiration of the limited stay of litigation on behalf of PREPA regarding fuel oil claims, which also includes the motion practice relating to the class action plaintiffs' effort to intervene. During the stay period, GJB anticipates preparing for post-stay litigation and discovery. Certain Fuel Oil-related litigation is not stayed, and may be subject to briefing at the Committee's discretion.

GJB anticipates continued prosecution of causes of action with the Oversight Board/Special Claims Committee regarding any conflicts regarding prosecution of the ERS lien challenges as modified by the ERS Scheduling Order.

135

<p>B195 Non-Working Travel³</p> <p><i>Notes: This task code includes time spent on non-working travel, including to court hearings and Committee meetings in San Juan, Boston and New York City, although attendance will be limited if required due to a conflict on behalf of Paul Hastings.</i></p>	0
<p>B210 Debtors' Financial Information and Operations/Fiscal Plan</p> <p><i>Notes: This task code includes time spent reviewing and analyzing the Debtors' fiscal plans and related matters. GJB is role in this category is limited to instances, if any, where Paul Hastings may have a conflict or where GJB may need to familiarize itself with matters that may impact litigation where GJB is serving as conflicts counsel to the Committee.</i></p>	10
<p>B220 Employee Benefits/Pensions</p> <p><i>Notes: This task code includes time spent reviewing and analyzing matters related to retiree benefit claims.</i></p>	0
<p>B230 Financing / Cash Collections</p> <p><i>Notes: This task code includes time spent on dealing with the Debtors' requests for financing, most notably the financing sought by PRASA.</i></p>	0
<p>B231 Security Document Analysis</p> <p><i>Notes: This task code includes time spent on reviewing and analyzing security documents and results from lien searches.</i></p>	0

³ The firm charges one-half a timekeeper's normal billing rate for any time incurred on account of non-working travel.

<p>B260 Meetings of and Communications with Debtors/Oversight Board</p> <p><i>Notes: This task code includes time spent on meeting and communicating with the Debtors, the Oversight Board, and their respective advisors. GJB anticipates significant collaboration with the Special Claims Committee of the FOMB on matters GJB has appears as conflicts counsel.</i></p>	<p>20</p>
<p>B261 Investigations</p>	<p>0</p>
<p>B310 Claims Administration and Objections</p> <p><i>Notes: This task code includes time spent on matters related to claims administration, including time spent on investigating potential challenges to claims, including, most notably, the challenge to the GO bond claims and the ERS bond claims. This task code also includes time spent on analyzing the pool of unsecured claims against the Debtors. GJB is role in this category is limited to instances, if any, where Paul Hastings may have a conflict.</i></p>	<p>10</p>
<p>B320 Plan and Disclosure Statement</p> <p><i>Notes: This task code includes time spent on matters related to a potential plan of adjustment for the title III Debtors. GJB will focus its participation on matters that impact its scope of work and avoid unnecessary duplication with Paul Hastings. Given the Oversight Board's recent filing of the Commonwealth amended plan of adjustment and disclosure statement, GJB anticipates spending time familiarizing itself with matters that may impact litigation where GJB is serving as conflicts counsel to the Committee.</i></p>	<p>60</p>

B420 Restructurings	
<p><i>Notes: This task code includes time spent on general restructuring matters, including the Commonwealth Amended Plan of Adjustment and Disclosure Statement, and PREPA RSA and the related 9019 motion.</i></p> <p><i>GJB anticipates continued involvement in the these matters to the extent that Paul Hastings is conflicted from the representation</i></p>	
	20
TOTAL HOURS	459
TOTAL ESTIMATED FEE⁴	\$210,410.194
MINUS 20% REDUCTION	\$42,082.04
TOTAL ESTIMATED FEE (NET OF REDUCTION)	\$168,328.15

⁴ Assumes Blended Rate of \$458.41

**ADDITIONAL STAFFING PLANS (INCL. SUB-BUDGETS)
FOR MATTERS JOINTLY PURSUED BY OVERSIGHT BOARD AND COMMITTEE**

Period Covered: May 1, 2020 through May 31, 2020

A. Adversary Proceedings Against Financial Parties, Fuel Oil Defendants, and Other Proceedings

Genovese Joblove & Battista PA., (“GJB” or “Firm”) as the Committee’s special litigation counsel, represents the Committee with respect to two (2) separate adversary proceedings against: (a) numerous underwriters and other financial target parties involved in the issuance of Commonwealth bonds [Adv. Proc. No. 19-280-LTS]; and (b) the claims of PREPA against fuel oil suppliers and laboratories to avoid certain fraudulent transfers [Adv. Pro. No. 19-388-LTS].

Pursuant to the Order entered on December 10, 2019, the litigation in Adv. Proc. No. 19-00388 has been stayed through June 30, 2020 with certain court-imposed obligations prior to that time. The Parties must meet and confer and provide the Court with a detailed Joint Status Report compliant with the below specifications by May 12, 2020. GJB will be involved in this process as appropriate. These proceedings are not subject to the Stay Order. Related litigation exists that must be evaluated and considered.

The stay relating to Adv. Proc. No. 19-280 was set to expire in April 2020, but the March 10, 2020 *Final Order Regarding (A) Stay Period, (B) Mandatory Mediation, and (c) Certain Deadlines Related Thereto* stays the proceedings pending a decision on confirmation. GJB is also involved in the evaluation and if warranted, litigation of, a lawsuit filed by certain monoline insurers to assert claims against the same defendants sued by the Committee in Adv. Proc. No. 19-280-LTS, which monoline suit has been removed to the PROMESA proceedings.

The Firm is reviewing and analyzing additional issues regarding settling bondholders that may result in litigation arising from anticipated confirmation issues.

1. Staffing Plan

Category of timekeeper (using categories maintained by the firm)	Number of timekeepers expected to work on the matter during the budget period	Average hourly rate for period May 1, 2020 through May 31, 2020	Average hourly rate for period May 1, 2020 through May 31, 2020 (net of 20% reduction)
Partner (20+ Years)	2	\$680	\$544
Partner (10+ Years)	2	\$525	\$420
Associate	4	\$375	\$300

Paraprofessionals	2	\$195	\$156
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2. Sub-Budget

U.S. Trustee Task Code and Project Category	Estimated Hours for Period May 1, 2020 through May 31, 2020
B191 General Litigation	100
TOTAL HOURS	110

B. Garden-Variety Avoidance Actions

GJB represents the Committee with respect to limited “garden-variety” avoidance actions [Adv. Proc. Nos. 19-267, 19-275-279] against entities that received preferential and fraudulent transfers before the petition date. Casillas, Santiago & Torres LLC, the Committee’s local counsel, represents the Committee with respect to the balance of the “garden-variety” avoidance actions initiated against vendors of the Commonwealth of Puerto Rico [Adv. Proc. Nos. 19-041 to 19-279, Adv. Proc. Nos. 19-347 to 19-354, and additional adversary proceedings to be commenced with respect to PREPA]. However, GJB may, from time-to-time, provide additional assistance to other committee counsel with respect to litigation matters within GJB’s subject matter expertise, but in no way duplicative of the work performed by other counsel on these matters.

On June 7, 2019, the Co-Plaintiffs in these avoidance actions filed a motion [Docket No. 7325] seeking approval of, among other things, procedures establishing a framework for streamlined execution of settlement agreements and procedures and guidelines for resolving the avoidance actions through a voluntary mediation process. On July 12, 2019, the Court entered an “*Order Granting Omnibus Motion by the Financial Oversight and Management Board for Puerto Rico, acting by and through the Members of the Special Claims Committee and the Official Committee of Unsecured Creditors to (i) Establish Litigation Case Management Procedures and (ii) Establish Procedures for Approval of Settlements.*” On December 6, 2019, the Court entered an “*Order Granting Omnibus Motion to Extend Deadlines in Order Granting Omnibus Motion by the Financial Oversight and Management Board for Puerto Rico, acting by and through the Members of the Special Claims Committee and the Official Committee of Unsecured Creditors to (i) Establish Litigation Case Management Procedures and (ii) Establish Procedures for Approval of Settlements.*” Accordingly, the Response Due Date was extended to April 13, 2020, the Motion to Dismiss Response Date was extended to May 13, 2020 and the Reply Deadline was extended to June 13, 2020. Accordingly, GJB anticipates that its workload with respect to “garden-variety” avoidance actions will be reduced.

1. Staffing Plan

Category of	Number of	Average hourly	Average hourly
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timekeeper (using categories maintained by the firm)	timekeepers expected to work on the matter during the budget period	rate for period May 1, 2020 through May 31, 2020	rate for period May 1, 2020 through May 31, 2020 (net of 20% reduction)
Partner (20+ Years)	2	\$575	\$460
Partner (10+ Years)	2	\$500	\$400
Associate	2	\$375	\$300
Paraprofessionals	2	\$195	\$156

2. Sub-Budget

U.S. Trustee Task Code and Project Category	Estimated Hours for Period May 1, 2020 through May 31, 2020
B191 General Litigation	10
TOTAL HOURS	10

We also note that, on June 7, 2019, the Co-Plaintiffs in these avoidance actions filed a motion [Docket No. 7325] seeking approval of, among other things, procedures establishing a framework for streamlined execution of settlement agreements and procedures and guidelines for resolving the avoidance actions through a voluntary mediation process. On July 12, 2019, the Court entered an “*Order Granting Omnibus Motion by the Financial Oversight and Management Board for Puerto Rico, acting by and through the Members of the Special Claims Committee and the Official Committee of Unsecured Creditors to (i) Establish Litigation Case Management Procedures and (ii) Establish Procedures for Approval of Settlements.*” On December 6, 2019, the Court entered an “*Order Granting Omnibus Motion to Extend Deadlines in Order Granting Omnibus Motion by the Financial Oversight and Management Board for Puerto Rico, acting by and through the Members of the Special Claims Committee and the Official Committee of Unsecured Creditors to (i) Establish Litigation Case Management Procedures and (ii) Establish Procedures for Approval of Settlements.*” Accordingly, the Response Due Date was extended to May 13, 2020, the Motion to Dismiss Response Date was extended to May 13, 2020 and the Reply Deadline was extended to June 13, 2020. Accordingly, GJB anticipates that its workload with respect to “garden-variety” avoidance actions will be reduced.

C. Currently Stayed Co-Plaintiff Adversary Proceedings

The Committee has been appointed as Co-Plaintiff/Co-Trustee with the Oversight Board or the members of the Special Claims Committee as to certain Adversary Proceedings. GJB represents the Committee as Special Litigation counsel in a subset of these adversary proceedings. Pursuant to the March 10, 2020 Final Order Regarding (A) Stay Period, (B) Mandatory

Mediation, and (c) Certain Deadlines Related Thereto the Court extended the stay. These matters are identified as follows:

- Four adversary proceedings seeking, among other things, declaratory judgments that the pertinent challenged GO bonds were issued in violation of the Constitution of Puerto Rico and to recover fraudulent transfers made on account of GO bonds that were not validly issued [Adv. Proc. No. 19-281, Adv. Proc. No. 19-282, Adv. Proc. No. 19-283, and Adv. Proc. No. 19-288]. These matters are stayed pending the decision on the Confirmation of the Amended Plan of Adjustment; and
- One adversary proceedings challenging liens asserted by certain holders of HTA bonds [Adv. Proc. No. 19-364]. These matters remain stayed until such time as the Court orders the stay lifted or a plan of adjustment is confirmed for HTA.

Accordingly, GJB does not expect to expend any significant time on these adversary proceedings during the month of April other than minor administrative and/or procedural work, including responding to inquiries from defendants and assisting Brown Rudnick and Proskauer, in general administration of these cases.

Also, on December 19, 2019, Judge Swain approved a briefing and hearing schedule with respect to motion to dismiss practice related to the GO Lien Challenge. This was stayed pending confirmation of the Amended Plan, pursuant to March 10, 2020 *Final Order Regarding (A) Stay Period, (B) Mandatory Mediation, and (c) Certain Deadlines Related Thereto*. GJB's involvement in the GO Lien Challenge is limited to one adversary listed below.

- One adversary proceeding challenging liens asserted by certain holders of GO bonds Adv. Proc. No. 19-297].

GJB's involvement in the GO Lien Challenge is expected to be minimal.

1. Staffing Plan

Category of timekeeper (using categories maintained by the firm)	Number of timekeepers expected to work on the matter during the budget period	Average hourly rate for period May 1, 2020 through May 31, 2020	Average hourly rate for period May 1, 2020 through May 31, 2020 (net of 20% reduction)
Partner (20+ Years)	2	\$575	\$460
Partner (10+ Years)	2	\$500	\$400
Associate	2	\$375	\$300

Paraprofessionals	2	\$195	\$156
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2. Sub-Budget

U.S. Trustee Task Code and Project Category	Estimated Hours for Period May 1, 2020 through May 31, 2020
B191 General Litigation	10
TOTAL HOURS	10

D. ERS Lien Co-Plaintiff Adversary Proceedings

Proskauer Rose LLP, as counsel to the Oversight Board, has primary responsibility for the adversary proceedings seeking, among other things, declarations on the scope of the liens purportedly securing the ERS bonds [Adv. Proc. No. 19-366 and Adv. Proc. No. 19-367]. GJB is counsel of record for the Committee in Adv. Proc. No. 19-367. These matters had been stayed pursuant to the July 25th, 2019 Order, but on October 24, 2019, the Court approved a scheduling order regarding discovery and summary judgment briefing on the lien scope issues and *ultra vires* issues with respect to the ERS bonds and lifted the stay. Accordingly, (a) the lien scope litigation, *i.e.*, Adv. Proc. No. 19-366 and Adv. Proc. No. 19-367 and (b) Count I of the complaints seeking declarations that the pertinent ERS bonds were issued *ultra vires* and, thus, are null and void, *i.e.*, Adv. Proc. No. 19-355, Adv. Proc. No. 19-356, Adv. Proc. No. 19-357, Adv. Proc. No. 19-359, and Adv. Proc. No. 19-361 were unstayed. GJB's involvement in the lien scope litigation is expected to be minimal and limited to Adv. Proc. No. 19-367.

In connection with the *ultra vires* objection to the ERS Bonds, GJB anticipates it will continue to be involved in certain discovery and briefing issues on a limited basis during the month of April.

1. Staffing Plan

Category of timekeeper (using categories maintained by the firm)	Number of timekeepers expected to work on the matter during the budget period	Average hourly rate for period May 1, 2020 through May 31, 2020	Average hourly rate for period May 1, 2020 through May 31, 2020 (net of 20% reduction)
Partner (20+ Years)	2	\$575	\$460
Partner (10+ Years)	2	\$500	\$400
Associate	2	\$375	\$300
Paraprofessionals	2	\$195	\$156

2. Sub-Budget

U.S. Trustee Task Code and Project Category	Estimated Hours for Period May 1, 2020 through May 31, 2020
B191 General Litigation	5
TOTAL HOURS	5

E. Contested Matters.

GJB represents the Committee with respect to several issues, including the following: the Adversary Defendants motion to participate in the GO Bond Claim Objections (and related mediation process); PREPA 9019 Motion relating to the RSA; and anticipated, litigated contested matters that are currently under advisement by the Committee. GJB anticipates its involvement in the PREPA 9019; GO/PBA Bondholder restructuring deal and amended Plan of Adjustment for the Commonwealth will increase during the month of April as detail review and consideration is given to the impact the New PSA and Amended Plan has on pending litigation.

1. Staffing Plan

Category of timekeeper (using categories maintained by the firm)	Number of timekeepers expected to work on the matter during the budget period	Average hourly rate for period May 1, 2020 through May 31, 2020	Average hourly rate for period May 1, 2020 through May 31, 2020 (net of 20% reduction)
Partner (20+ Years)	3	\$645	\$516
Partner (10+ Years)	2	\$525	\$420
Associate	4	\$375	\$300
Paraprofessionals	2	\$195	\$156

2. Sub-Budget

U.S. Trustee Task Code and Project Category	Estimated Hours for Period May 1, 2020 through May 31, 2020
B190 Other Contested Matters	70
TOTAL HOURS	70

GENERAL STAFFING PLAN

Period Covered: May 1, 2020 through May 31, 2020⁵

Category of timekeeper (using categories maintained by the firm)	Number of timekeepers expected to work on the matter during the budget period	Average hourly rate for period May 1, 2020 through May 31, 2020	Average hourly rate for period May 1, 2020 through May 31, 2020 (net of 20% reduction)
Partner (20+ Years)	5	\$615	\$492
Partner (10+ Years)	2	\$525	\$420
Associate	4	\$375	\$300
Paraprofessionals	2	\$195	\$156

⁵ Unless otherwise indicated in this budget, this proposed staffing plan is based on the following assumptions: (i) no additional title III cases or adversary proceedings will be commenced during the budget period; (ii) no plan of adjustment will be filed during the budget period; (iii) no adversary proceedings will require discovery and trial preparation; and (iv) all adversary proceedings in which the Committee has intervened and/or sought to intervene will only involve briefing and hearings on motions to dismiss and/or pretrial proceedings. In addition, it is impossible to predict how many hours will be required to prosecute contested matters where GJB is asked to participate as conflicts counsel. Thus, this proposed budget may be materially different from the work actually performed. For instance, discovery disputes may lead to extensive litigation. Similarly, the Committee may need to respond to motions that are not and cannot be anticipated. At this time, the proposed budget is speculative. The proposed amended budget has been revised to account for the stay of litigation and other proceedings.

Case Name and Number: 17 BK 3283-LTS (Jointly Administered)
Applicant's Name: Genovese, Joblove & Battista, P.A., as Special Litigation Counsel
to the Official Committee Of Unsecured Creditors
Of The Commonwealth Of Puerto Rico, *et al.*

BUDGET 1

Period Covered: June 1, 2020 through June 30, 2020²

U.S. Trustee Task Code and Project Category	Estimated Hours for Period June 1, 2020 through June 30, 2020
B110 Case Administration <i>Notes: This task code includes general case strategy and planning, case management, internal Committee matters, internal meetings, and meetings with Paul Hastings.</i>	30
B112 General Creditor Inquiries <i>Notes: This task code includes responding to and addressing questions and inquiries from creditors.</i>	2

¹ This budget may be substantially impacted by worldwide conditions resulting from the Coronavirus pandemic, which may include adjournments, continuances, and stays of legal proceedings. This budget assumes an adjournment on the Disclosure Statement hearings and related proceedings.

² Unless otherwise indicated, this proposed budget is based on the following assumptions: (i) no additional title III cases or adversary proceedings will be commenced during the budget period; (ii) no new plan of adjustment will be filed during the budget period; (iii) no adversary proceedings will require discovery and trial preparation; and (iv) all adversary proceedings in which the Committee has intervened and/or sought to intervene will only involve briefing and hearings on motions to dismiss, motions to stay, and/or pretrial proceedings. In addition, it is impossible to predict how many hours will be required to prosecute contested matters where GJB is asked to participate as conflicts counsel. Thus, this proposed budget may be materially different from the work actually performed. For instance, discovery disputes may lead to extensive litigation. Similarly, the Committee may need to respond to motions that are not and cannot be anticipated. At this time, the proposed budget is speculative. The proposed budget has been revised to account for the March 10, 2020 Final Order Regarding (A) Stay Period, (B) Mandatory Mediation, and (c) Certain Deadlines Related Thereto, with regard to several adversary proceedings for which the Committee has been appointed as co-plaintiff/co-trustee with the Oversight Board or the members of the Special Claims Committee, as well as the rescheduled PREPA RSA 9019 hearing.

<p>B113 Pleadings Review</p> <p><i>Notes: This task code includes review of relevant pleadings in the title III cases as well as all related adversary proceedings. GJB will focus its review on matters that impact its scope of work.</i></p>	<p>20</p>
<p>B120 Asset Analysis and Recovery</p> <p><i>Notes: This task code includes review and analysis of the Debtors' assets, including proceeds from insurance policies.</i></p>	<p>0</p>
<p>B130 Asset Disposition</p> <p><i>Notes: This task code includes work related to the Debtors' efforts to sell or otherwise dispose of their assets.</i></p>	<p>0</p>
<p>B140 Relief from Stay / Adequate Protection Proceedings</p> <p><i>Notes: This task code includes work related to motions for relief from stay, including the stay relief motion filed by the ERS bondholders and the receiver motion filed by the PREPA bondholders. GJB is not taking an active role on stay relief requests and its role in this category is limited to instances, if any, where Paul Hastings may have a conflict.</i></p>	<p>0</p>
<p>B150 Meetings of Creditors' Committee and Communications with Creditors</p> <p><i>Notes: This task code includes time spent on telephone conferences, meetings, and other communications with the Committee, including preparation for such calls and meetings. GJB will focus its participation on matters that impact its scope of work and avoid unnecessary duplication with Paul Hastings.</i></p>	<p>20</p>

<p>B155 Court Hearings</p> <p><i>Notes: This task codes includes time spent in court hearings in the title III cases and the related adversary proceedings. This task code also includes time spent preparing for such hearings. GJB will focus its participation on matters that impact its scope of work and avoid unnecessary duplication with Paul Hastings and the Special Claims Committee.</i></p>	<p>10</p>
<p>B160 Employment / Fee Applications</p> <p><i>Notes: This task code includes time spent on complying with the interim compensation order, including preparing GJB's fee statements, as well as responding to inquiries from the fee examiner related thereto.</i></p>	<p>20</p>
<p>B161 Budgeting (Case)</p> <p><i>Notes: This task code includes time spent on preparing GJB's monthly budgets, as required by the fee examiner.</i></p>	<p>3</p>
<p>B165 Fee and Employment Applications of Other Professionals</p> <p><i>Notes: This task code includes time spent on reviewing fee and retention applications of other professionals in these title III cases only as it relates to (i) committee professionals operating at the direction of GJB as conflicts counsel; or (ii) where matters principally handled by GJB are implicated.</i></p>	<p>2</p>
<p>B170 Fee and Employment Objections</p> <p><i>Notes: This task code includes time spent on preparing or responding to objections to fee and retention applications.</i></p>	<p>5</p>

<p>B180 Avoidance Action Analysis</p> <p><i>Notes: This task code includes time spent on analyzing potential claims for avoidance, including preferential transfers and fraudulent transfers. GJB will focus its participation on matters that impact its scope of work and avoid unnecessary duplication with Paul Hastings or other counsel handling such matters for the Committee or the Special Claims Committee, to the extent it is a Co-Plaintiff.</i></p>	<p>7</p>
<p>B185 Assumption / Rejection of Leases and Contracts</p> <p><i>Notes: This task code includes time spent on analyzing issues related to the assumption or rejection of executory contracts and unexpired leases. GJB is role in this category is limited to instances, if any, where Paul Hastings may have a conflict.</i></p>	<p>0</p>
<p>B190 Other Contested Matters</p> <p><i>Notes: This task code includes time spent on all contested matters in the title III cases. GJB's role in this category is limited to instances, if any, where Paul Hastings may have a conflict. GJB anticipates potential main case litigation concerning matters where Paul Hastings has identified conflicts with parties that may become potentially adverse to the Committee. Further, adverse and interested parties to litigation initiated by GJB on behalf of the Committee have sought to participate in main case issues, including claims objections. Currently, the disputes in which GJB has primary responsibility are limited in scope due to the stay orders in effect. .</i></p>	<p>50</p>

191 General Litigation (including Commonwealth litigation, mediation process, and handling of adversary proceedings)

Notes: This task code includes time spent on litigation matters, including all adversary proceedings. We anticipate that work under this task code will including (a) the joint prosecution of causes of action together with Oversight Board/Special Claims Committee in 22 separate lawsuits, and (b) monitoring other adversary proceedings and litigation. GJB's role in this category is limited to those adversary proceedings in which GJB has appeared as and is the lead counsel for the Committee. This role may require coordination with other counsel in related matters concerning global legal issues. Currently, many of these matters are stayed pending confirmation pursuant to Court orders in effect.

GJB anticipates primary responsibility regarding an adversary proceeding removed to the PROMESA court regarding monoline insurers' claims against underwriter defendants.

GJB anticipates continued briefing relating to motion practice relating to pending adversary proceedings and continued discovery as to limited issues excepted from the Stay or pursuant to the March 10, 2020 Final Order Regarding (A) Stay Period, (B) Mandatory Mediation, and (c) Certain Deadlines Related Thereto

GJB anticipates the continued stay of litigation on behalf of PREPA regarding fuel oil claims, which also includes the motion practice relating to the class action plaintiffs' effort to intervene. During the stay period, GJB anticipates preparing for post-stay litigation and discovery. Certain Fuel Oil-related litigation is not stayed, and may be subject to briefing at the Committee's discretion.

GJB anticipates continued prosecution of causes of action with the Oversight Board/Special Claims Committee regarding any conflicts regarding prosecution of the ERS lien challenges as modified by the ERS Scheduling Order.

<p>B195 Non-Working Travel³</p> <p><i>Notes: This task code includes time spent on non-working travel, including to court hearings and Committee meetings in San Juan, Boston and New York City, although attendance will be limited if required due to a conflict on behalf of Paul Hastings.</i></p>	<p>0</p>
<p>B210 Debtors' Financial Information and Operations/Fiscal Plan</p> <p><i>Notes: This task code includes time spent reviewing and analyzing the Debtors' fiscal plans and related matters. GJB is role in this category is limited to instances, if any, where Paul Hastings may have a conflict or where GJB may need to familiarize itself with matters that may impact litigation where GJB is serving as conflicts counsel to the Committee.</i></p>	<p>10</p>
<p>B220 Employee Benefits/Pensions</p> <p><i>Notes: This task code includes time spent reviewing and analyzing matters related to retiree benefit claims.</i></p>	<p>0</p>
<p>B230 Financing / Cash Collections</p> <p><i>Notes: This task code includes time spent on dealing with the Debtors' requests for financing, most notably the financing sought by PRASA.</i></p>	<p>0</p>
<p>B231 Security Document Analysis</p> <p><i>Notes: This task code includes time spent on reviewing and analyzing security documents and results from lien searches.</i></p>	<p>0</p>

³ The firm charges one-half a timekeeper's normal billing rate for any time incurred on account of non-working travel.

<p>B260 Meetings of and Communications with Debtors/Oversight Board</p> <p><i>Notes: This task code includes time spent on meeting and communicating with the Debtors, the Oversight Board, and their respective advisors. GJB anticipates significant collaboration with the Special Claims Committee of the FOMB on matters GJB has appears as conflicts counsel.</i></p>	<p>10</p>
<p>B261 Investigations</p>	<p>0</p>
<p>B310 Claims Administration and Objections</p> <p><i>Notes: This task code includes time spent on matters related to claims administration, including time spent on investigating potential challenges to claims, including, most notably, the challenge to the GO bond claims and the ERS bond claims. This task code also includes time spent on analyzing the pool of unsecured claims against the Debtors. GJB is role in this category is limited to instances, if any, where Paul Hastings may have a conflict.</i></p>	<p>10</p>
<p>B320 Plan and Disclosure Statement</p> <p><i>Notes: This task code includes time spent on matters related to a potential plan of adjustment for the title III Debtors. GJB will focus its participation on matters that impact its scope of work and avoid unnecessary duplication with Paul Hastings. Given the Oversight Board's anticipated filing of an amended Commonwealth plan of adjustment and disclosure statement, GJB anticipates spending time familiarizing itself with matters that may impact litigation where GJB is serving as conflicts counsel to the Committee.</i></p>	<p>50</p>

B420 Restructurings	
<p><i>Notes: This task code includes time spent on general restructuring matters, including an anticipated amendment Commonwealth Plan of Adjustment and Disclosure Statement, and PREPA RSA (as may be amended) and the related 9019 motion.</i></p> <p><i>GJB anticipates continued involvement in the these matters to the extent that Paul Hastings is conflicted from the representation</i></p>	
	35
TOTAL HOURS	399
TOTAL ESTIMATED FEE⁴	\$182,905.59
MINUS 20% REDUCTION	\$36,581.19
TOTAL ESTIMATED FEE (NET OF REDUCTION)	\$146,324.4

⁴ Assumes Blended Rate of \$458.41

**ADDITIONAL STAFFING PLANS (INCL. SUB-BUDGETS)
FOR MATTERS JOINTLY PURSUED BY OVERSIGHT BOARD AND COMMITTEE**

Period Covered: June 1, 2020 through June 30, 2020

A. Adversary Proceedings Against Financial Parties, Fuel Oil Defendants, and Other Proceedings

Genovese Joblove & Battista PA., (“GJB” or “Firm”) as the Committee’s special litigation counsel, represents the Committee with respect to two (2) separate adversary proceedings against: (a) numerous underwriters and other financial target parties involved in the issuance of Commonwealth bonds [Adv. Proc. No. 19-280-LTS]; and (b) the claims of PREPA against fuel oil suppliers and laboratories to avoid certain fraudulent transfers [Adv. Pro. No. 19-388-LTS].

Pursuant to the Order entered on December 10, 2019, the litigation in Adv. Proc. No. 19-00388 has been stayed through June 30, 2020 with certain court-imposed obligations prior to that time. The Parties have met and conferred and provide the Court with a Joint Status Report requesting a rescheduling of the status report until July 15, 2020 to permit more clarity regarding the effect of the Covid 19 pandemic. These proceedings are not subject to the Stay Order. Related litigation exists that must be evaluated and considered as it arises.

The stay relating to Adv. Proc. No. 19-280 was set to expire in April 2020, but the March 10, 2020 *Final Order Regarding (A) Stay Period, (B) Mandatory Mediation, and (c) Certain Deadlines Related Thereto* stays the proceedings pending a decision on confirmation. GJB is also involved in the evaluation and if warranted, litigation of, a lawsuit filed by certain monoline insurers to assert claims against the same defendants sued by the Committee in Adv. Proc. No. 19-280-LTS, which monoline suit has been removed to the PROMESA proceedings.

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2. Sub-Budget

U.S. Trustee Task Code and Project Category	Estimated Hours for Period June 1, 2020 through June 30, 2020
B191 General Litigation	115
TOTAL HOURS	115

B. Garden-Variety Avoidance Actions

GJB represents the Committee with respect to limited “garden-variety” avoidance actions [Adv. Proc. Nos. 19-267, 19-275-279] against entities that received preferential and fraudulent transfers before the petition date. Casillas, Santiago & Torres LLC, the Committee’s local counsel, represents the Committee with respect to the balance of the “garden-variety” avoidance actions initiated against vendors of the Commonwealth of Puerto Rico [Adv. Proc. Nos. 19-041 to 19-279, Adv. Proc. Nos. 19-347 to 19-354, and additional adversary proceedings to be commenced with respect to PREPA]. However, GJB may, from time-to-time, provide additional assistance to other committee counsel with respect to litigation matters within GJB’s subject matter expertise, but in no way duplicative of the work performed by other counsel on these matters.

On June 7, 2019, the Co-Plaintiffs in these avoidance actions filed a motion [Docket No. 7325] seeking approval of, among other things, procedures establishing a framework for streamlined execution of settlement agreements and procedures and guidelines for resolving the avoidance actions through a voluntary mediation process. On July 12, 2019, the Court entered an “*Order Granting Omnibus Motion by the Financial Oversight and Management Board for Puerto Rico, acting by and through the Members of the Special Claims Committee and the Official Committee of Unsecured Creditors to (i) Establish Litigation Case Management Procedures and (ii) Establish Procedures for Approval of Settlements.*” On December 6, 2019, the Court entered an “*Order Granting Omnibus Motion to Extend Deadlines in Order Granting Omnibus Motion by the Financial Oversight and Management Board for Puerto Rico, acting by and through the Members of the Special Claims Committee and the Official Committee of Unsecured Creditors to (i) Establish Litigation Case Management Procedures and (ii) Establish Procedures for Approval of Settlements.*” Accordingly, the Response Due Date was extended to April 13, 2020, the Motion to Dismiss Response Date was extended to May 13, 2020 and the Reply Deadline was extended to June 13, 2020. Accordingly, GJB anticipates that its workload with respect to “garden-variety” avoidance actions will continue at a reduced level. .

1. Staffing Plan

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Partner (20+ Years)	2	\$575	\$460
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2. Sub-Budget

U.S. Trustee Task Code and Project Category	Estimated Hours for Period June 1, 2020 through June 30, 2020
B191 General Litigation	10
TOTAL HOURS	10

We also note that, on June 7, 2019, the Co-Plaintiffs in these avoidance actions filed a motion [Docket No. 7325] seeking approval of, among other things, procedures establishing a framework for streamlined execution of settlement agreements and procedures and guidelines for resolving the avoidance actions through a voluntary mediation process. On July 12, 2019, the Court entered an “*Order Granting Omnibus Motion by the Financial Oversight and Management Board for Puerto Rico, acting by and through the Members of the Special Claims Committee and the Official Committee of Unsecured Creditors to (i) Establish Litigation Case Management Procedures and (ii) Establish Procedures for Approval of Settlements.*” On December 6, 2019, the Court entered an “*Order Granting Omnibus Motion to Extend Deadlines in Order Granting Omnibus Motion by the Financial Oversight and Management Board for Puerto Rico, acting by and through the Members of the Special Claims Committee and the Official Committee of Unsecured Creditors to (i) Establish Litigation Case Management Procedures and (ii) Establish Procedures for Approval of Settlements.*” Accordingly, the Response Due Date was extended to May 13, 2020, the Motion to Dismiss Response Date was extended to May 13, 2020 and the Reply Deadline was extended to June 13, 2020. Accordingly, GJB anticipates that its workload with respect to “garden-variety” avoidance actions will be reduced.

C. Currently Stayed Co-Plaintiff Adversary Proceedings

The Committee has been appointed as Co-Plaintiff/Co-Trustee with the Oversight Board or the members of the Special Claims Committee as to certain Adversary Proceedings. GJB represents the Committee as Special Litigation counsel in a subset of these adversary proceedings. Pursuant to the March 10, 2020 Final Order Regarding (A) Stay Period, (B) Mandatory Mediation, and (c) Certain Deadlines Related Thereto the Court extended the stay. These matters are identified as follows:

- Four adversary proceedings seeking, among other things, declaratory judgments that the pertinent challenged GO bonds were issued in violation of the Constitution of Puerto Rico and to recover fraudulent transfers made on account of GO bonds that were not validly issued [Adv. Proc. No. 19-281, Adv. Proc. No. 19-282, Adv. Proc. No. 19-283, and Adv. Proc. No. 19-288]. These matters are stayed pending the decision on the Confirmation of the Amended Plan of Adjustment; and
- One adversary proceedings challenging liens asserted by certain holders of HTA bonds [Adv. Proc. No. 19-364]. These matters remain stayed until such time as the Court orders the stay lifted or a plan of adjustment is confirmed for HTA.

Accordingly, GJB does not expect to expend any significant time on these adversary proceedings during the month of April other than minor administrative and/or procedural work, including responding to inquiries from defendants and assisting Brown Rudnick and Proskauer, in general administration of these cases.

Also, on December 19, 2019, Judge Swain approved a briefing and hearing schedule with respect to motion to dismiss practice related to the GO Lien Challenge. This was stayed pending confirmation of the Amended Plan, pursuant to March 10, 2020 *Final Order Regarding (A) Stay Period, (B) Mandatory Mediation, and (c) Certain Deadlines Related Thereto*. GJB's involvement in the GO Lien Challenge is limited to one adversary listed below.

- One adversary proceeding challenging liens asserted by certain holders of GO bonds Adv. Proc. No. 19-297].

GJB's involvement in the GO Lien Challenge is expected to be minimal.

1. Staffing Plan

Category of timekeeper (using categories maintained by the firm)	Number of timekeepers expected to work on the matter during the budget period	Average hourly rate for period June 1, 2020 through June 30, 2020	Average hourly rate for period June 1, 2020 through June 30, 2020 (net of 20% reduction)
Partner (20+ Years)	2	\$575	\$460
Partner (10+ Years)	2	\$500	\$400

Associate	2	\$375	\$300
Paraprofessionals	2	\$195	\$156

2. Sub-Budget

U.S. Trustee Task Code and Project Category	Estimated Hours for Period June 1, 2020 through June 30, 2020
B191 General Litigation	10
TOTAL HOURS	10

D. ERS Lien Co-Plaintiff Adversary Proceedings

Proskauer Rose LLP, as counsel to the Oversight Board, has primary responsibility for the adversary proceedings seeking, among other things, declarations on the scope of the liens purportedly securing the ERS bonds [Adv. Proc. No. 19-366 and Adv. Proc. No. 19-367]. GJB is counsel of record for the Committee in Adv. Proc. No. 19-367. These matters had been stayed pursuant to the July 25th, 2019 Order, but on October 24, 2019, the Court approved a scheduling order regarding discovery and summary judgment briefing on the lien scope issues and *ultra vires* issues with respect to the ERS bonds and lifted the stay. Accordingly, (a) the lien scope litigation, *i.e.*, Adv. Proc. No. 19-366 and Adv. Proc. No. 19-367 and (b) Count I of the complaints seeking declarations that the pertinent ERS bonds were issued *ultra vires* and, thus, are null and void, *i.e.*, Adv. Proc. No. 19-355, Adv. Proc. No. 19-356, Adv. Proc. No. 19-357, Adv. Proc. No. 19-359, and Adv. Proc. No. 19-361 were unstayed. GJB's involvement in the lien scope litigation is expected to be minimal and limited to Adv. Proc. No. 19-367.

In connection with the *ultra vires* objection to the ERS Bonds, GJB anticipates it will continue to be involved in certain discovery and briefing issues on a limited basis during the month of April.

1. Staffing Plan

Category of timekeeper (using categories maintained by the firm)	Number of timekeepers expected to work on the matter during the budget period	Average hourly rate for period June 1, 2020 through June 30, 2020	Average hourly rate for period June 1, 2020 through June 30, 2020 (net of 20% reduction)
Partner (20+ Years)	2	\$575	\$460
Partner (10+ Years)	2	\$500	\$400
Associate	2	\$375	\$300

Paraprofessionals	2	\$195	\$156
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2. Sub-Budget

U.S. Trustee Task Code and Project Category	Estimated Hours for Period June 1, 2020 through June 30, 2020
B191 General Litigation	5
TOTAL HOURS	5

E. Contested Matters.

GJB represents the Committee with respect to several issues, including the following: the Adversary Defendants motion to participate in the GO Bond Claim Objections (and related mediation process); PREPA 9019 Motion relating to the RSA; and anticipated, litigated contested matters that are currently under advisement by the Committee. GJB anticipates its involvement in the PREPA 9019; GO/PBA Bondholder restructuring deal and amended Plan of Adjustment for the Commonwealth will increase during the month of April as detail review and consideration is given to the impact the New PSA and Amended Plan has on pending litigation.

1. Staffing Plan

Category of timekeeper (using categories maintained by the firm)	Number of timekeepers expected to work on the matter during the budget period	Average hourly rate for period June 1, 2020 through June 30, 2020	Average hourly rate for period June 1, 2020 through June 30, 2020 (net of 20% reduction)
Partner (20+ Years)	3	\$645	\$516
Partner (10+ Years)	2	\$525	\$420
Associate	4	\$375	\$300
Paraprofessionals	2	\$195	\$156

2. Sub-Budget

U.S. Trustee Task Code and Project Category	Estimated Hours for Period June 1, 2020 through June 30, 2020
B190 Other Contested Matters	50
TOTAL HOURS	50

GENERAL STAFFING PLAN

Period Covered: June 1, 2020 through June 30, 2020⁵

Category of timekeeper (using categories maintained by the firm)	Number of timekeepers expected to work on the matter during the budget period	Average hourly rate for period June 1, 2020 through June 30, 2020	Average hourly rate for period June 1, 2020 through June 30, 2020 (net of 20% reduction)
Partner (20+ Years)	5	\$615	\$492
Partner (10+ Years)	2	\$525	\$420
Associate	4	\$375	\$300
Paraprofessionals	2	\$195	\$156

⁵ Unless otherwise indicated in this budget, this proposed staffing plan is based on the following assumptions: (i) no additional title III cases or adversary proceedings will be commenced during the budget period; (ii) no plan of adjustment will be filed during the budget period; (iii) no adversary proceedings will require discovery and trial preparation; and (iv) all adversary proceedings in which the Committee has intervened and/or sought to intervene will only involve briefing and hearings on motions to dismiss and/or pretrial proceedings. In addition, it is impossible to predict how many hours will be required to prosecute contested matters where GJB is asked to participate as conflicts counsel. Thus, this proposed budget may be materially different from the work actually performed. For instance, discovery disputes may lead to extensive litigation. Similarly, the Committee may need to respond to motions that are not and cannot be anticipated. At this time, the proposed budget is speculative. The proposed amended budget has been revised to account for the stay of litigation and other proceedings.

Case Name and Number: 17 BK 3283-LTS (Jointly Administered)
Applicant's Name: Genovese, Joblove & Battista, P.A., as Special Litigation Counsel
to the Official Committee Of Unsecured Creditors
Of The Commonwealth Of Puerto Rico, *et al.*

BUDGET 1

Period Covered: July 1, 2020 through July 31, 2020²

U.S. Trustee Task Code and Project Category	Estimated Hours for Period July 1, 2020 through July 31, 2020
B110 Case Administration <i>Notes: This task code includes general case strategy and planning, case management, internal Committee matters, internal meetings, and meetings with Paul Hastings.</i>	30
B112 General Creditor Inquiries <i>Notes: This task code includes responding to and addressing questions and inquiries from creditors.</i>	2

¹ This budget may be substantially impacted by worldwide conditions resulting from the Coronavirus pandemic, which may include adjournments, continuances, and stays of legal proceedings. This budget assumes an adjournment on the Disclosure Statement hearings and related proceedings.

² Unless otherwise indicated, this proposed budget is based on the following assumptions: (i) no additional title III cases or adversary proceedings will be commenced during the budget period; (ii) no new plan of adjustment will be filed during the budget period; (iii) no adversary proceedings will require discovery and trial preparation; and (iv) all adversary proceedings in which the Committee has intervened and/or sought to intervene will only involve briefing and hearings on motions to dismiss, motions to stay, and/or pretrial proceedings. In addition, it is impossible to predict how many hours will be required to prosecute contested matters where GJB is asked to participate as conflicts counsel. Thus, this proposed budget may be materially different from the work actually performed. For instance, discovery disputes may lead to extensive litigation. Similarly, the Committee may need to respond to motions that are not and cannot be anticipated. At this time, the proposed budget is speculative. The proposed budget has been revised to account for the March 10, 2020 Final Order Regarding (A) Stay Period, (B) Mandatory Mediation, and (c) Certain Deadlines Related Thereto, (as amended and modified by subsequent orders) with regard to several adversary proceedings for which the Committee has been appointed as co-plaintiff/co-trustee with the Oversight Board or the members of the Special Claims Committee, as well as the rescheduled PREPA RSA 9019 hearing.

<p>B113 Pleadings Review</p> <p><i>Notes: This task code includes review of relevant pleadings in the title III cases as well as all related adversary proceedings. GJB will focus its review on matters that impact its scope of work.</i></p>	<p>20</p>
<p>B120 Asset Analysis and Recovery</p> <p><i>Notes: This task code includes review and analysis of the Debtors' assets, including proceeds from insurance policies.</i></p>	<p>0</p>
<p>B130 Asset Disposition</p> <p><i>Notes: This task code includes work related to the Debtors' efforts to sell or otherwise dispose of their assets.</i></p>	<p>0</p>
<p>B140 Relief from Stay / Adequate Protection Proceedings</p> <p><i>Notes: This task code includes work related to motions for relief from stay, including the stay relief motion filed by the ERS bondholders and the receiver motion filed by the PREPA bondholders. GJB is not taking an active role on stay relief requests and its role in this category is limited to instances, if any, where Paul Hastings may have a conflict.</i></p>	<p>0</p>
<p>B150 Meetings of Creditors' Committee and Communications with Creditors</p> <p><i>Notes: This task code includes time spent on telephone conferences, meetings, and other communications with the Committee, including preparation for such calls and meetings. GJB will focus its participation on matters that impact its scope of work and avoid unnecessary duplication with Paul Hastings.</i></p>	<p>18</p>

<p>B155 Court Hearings</p> <p><i>Notes: This task codes includes time spent in court hearings in the title III cases and the related adversary proceedings. This task code also includes time spent preparing for such hearings. GJB will focus its participation on matters that impact its scope of work and avoid unnecessary duplication with Paul Hastings and the Special Claims Committee.</i></p>	<p>20</p>
<p>B160 Employment / Fee Applications</p> <p><i>Notes: This task code includes time spent on complying with the interim compensation order, including preparing GJB's fee statements, as well as responding to inquiries from the fee examiner related thereto.</i></p>	<p>20</p>
<p>B161 Budgeting (Case)</p> <p><i>Notes: This task code includes time spent on preparing GJB's monthly budgets, as required by the fee examiner.</i></p>	<p>2</p>
<p>B165 Fee and Employment Applications of Other Professionals</p> <p><i>Notes: This task code includes time spent on reviewing fee and retention applications of other professionals in these title III cases only as it relates to (i) committee professionals operating at the direction of GJB as conflicts counsel; or (ii) where matters principally handled by GJB are implicated.</i></p>	<p>2</p>
<p>B170 Fee and Employment Objections</p> <p><i>Notes: This task code includes time spent on preparing or responding to objections to fee and retention applications.</i></p>	<p>5</p>

<p>B180 Avoidance Action Analysis</p> <p><i>Notes: This task code includes time spent on analyzing potential claims for avoidance, including preferential transfers and fraudulent transfers. GJB will focus its participation on matters that impact its scope of work and avoid unnecessary duplication with Paul Hastings or other counsel handling such matters for the Committee or the Special Claims Committee, to the extent it is a Co-Plaintiff.</i></p>	<p>7</p>
<p>B185 Assumption / Rejection of Leases and Contracts</p> <p><i>Notes: This task code includes time spent on analyzing issues related to the assumption or rejection of executory contracts and unexpired leases. GJB's role in this category is limited to instances, if any, where Paul Hastings may have a conflict.</i></p>	<p>0</p>
<p>B190 Other Contested Matters</p> <p><i>Notes: This task code includes time spent on all contested matters in the title III cases. GJB's role in this category is limited to instances, if any, where Paul Hastings may have a conflict. GJB anticipates potential main case litigation concerning matters where Paul Hastings has identified conflicts with parties that may become potentially adverse to the Committee. Further, adverse and interested parties to litigation initiated by GJB on behalf of the Committee have sought to participate in main case issues, including claims objections. Currently, the disputes in which GJB has primary responsibility are limited in scope due to the stay orders in effect.</i></p>	<p>35</p>

191 General Litigation (including Commonwealth litigation, mediation process, and handling of adversary proceedings)

Notes: This task code includes time spent on litigation matters, including all adversary proceedings. We anticipate that work under this task code will including (a) the joint prosecution of causes of action together with Oversight Board/Special Claims Committee in 22 separate lawsuits, and (b) monitoring other adversary proceedings and litigation. GJB's role in this category is limited to those adversary proceedings in which GJB has appeared as and is the lead counsel for the Committee. This role may require coordination with other counsel in related matters concerning global legal issues. Currently, many of these matters are stayed pending confirmation pursuant to Court orders in effect.

GJB anticipates primary responsibility regarding an adversary proceeding removed to the PROMESA court regarding monoline insurers' claims against underwriter defendants.

GJB anticipates continued briefing relating to motion practice relating to pending adversary proceedings and continued discovery as to limited issues excepted from the Stay or pursuant to the March 10, 2020 Final Order Regarding (A) Stay Period, (B) Mandatory Mediation, and (c) Certain Deadlines Related Thereto

GJB anticipates the continued stay of litigation on behalf of PREPA regarding fuel oil claims, which also includes the motion practice relating to the class action plaintiffs' effort to intervene. During the stay period, GJB anticipates preparing for post-stay litigation and discovery. Certain Fuel Oil-related litigation is not stayed, and may be subject to briefing at the Committee's discretion.

GJB anticipates continued prosecution of causes of action with the Oversight Board/Special Claims Committee regarding any conflicts regarding prosecution of the ERS lien challenges as modified by the ERS Scheduling Order.

GJB anticipates additional research and analysis regarding potential claims against third parties arising from the PSA as additional information becomes available

<p>B195 Non-Working Travel³</p> <p><i>Notes: This task code includes time spent on non-working travel, including to court hearings and Committee meetings in San Juan, Boston and New York City, although attendance will be limited if required due to a conflict on behalf of Paul Hastings.</i></p>	<p>10</p>
<p>B210 Debtors' Financial Information and Operations/Fiscal Plan</p> <p><i>Notes: This task code includes time spent reviewing and analyzing the Debtors' fiscal plans and related matters. GJB is role in this category is limited to instances, if any, where Paul Hastings may have a conflict or where GJB may need to familiarize itself with matters that may impact litigation where GJB is serving as conflicts counsel to the Committee.</i></p>	<p>10</p>
<p>B220 Employee Benefits/Pensions</p> <p><i>Notes: This task code includes time spent reviewing and analyzing matters related to retiree benefit claims.</i></p>	<p>0</p>
<p>B230 Financing / Cash Collections</p> <p><i>Notes: This task code includes time spent on dealing with the Debtors' requests for financing, most notably the financing sought by PRASA.</i></p>	<p>0</p>
<p>B231 Security Document Analysis</p> <p><i>Notes: This task code includes time spent on reviewing and analyzing security documents and results from lien searches.</i></p>	<p>0</p>

³ The firm charges one-half a timekeeper's normal billing rate for any time incurred on account of non-working travel.

<p>B260 Meetings of and Communications with Debtors/Oversight Board</p> <p><i>Notes: This task code includes time spent on meeting and communicating with the Debtors, the Oversight Board, and their respective advisors. GJB anticipates significant collaboration with the Special Claims Committee of the FOMB on matters GJB has appears as conflicts counsel.</i></p>	<p>10</p>
<p>B261 Investigations</p>	<p>0</p>
<p>B310 Claims Administration and Objections</p> <p><i>Notes: This task code includes time spent on matters related to claims administration, including time spent on investigating potential challenges to claims, including, most notably, the challenge to the GO bond claims and the ERS bond claims. This task code also includes time spent on analyzing the pool of unsecured claims against the Debtors. GJB is role in this category is limited to instances, if any, where Paul Hastings may have a conflict.</i></p>	<p>10</p>
<p>B320 Plan and Disclosure Statement</p> <p><i>Notes: This task code includes time spent on matters related to a potential plan of adjustment for the title III Debtors. GJB will focus its participation on matters that impact its scope of work and avoid unnecessary duplication with Paul Hastings. Given the Oversight Board's anticipated filing of an amended Commonwealth plan of adjustment and disclosure statement, GJB anticipates spending time familiarizing itself with matters that may impact litigation where GJB is serving as conflicts counsel to the Committee.</i></p>	<p>40</p>
<p>B420 Restructurings</p> <p><i>Notes: This task code includes time spent on general restructuring matters, including an anticipated amendment Commonwealth Plan of Adjustment and Disclosure Statement, and PREPA RSA (as may be amended) and the related 9019 motion. GJB anticipates continued involvement in the these matters to the extent that Paul Hastings is conflicted from the representation</i></p>	<p>25</p>

TOTAL HOURS	366
TOTAL ESTIMATED FEE⁴	\$167,778.06
<i>MINUS 20% REDUCTION</i>	\$33,555.61
TOTAL ESTIMATED FEE (NET OF REDUCTION)	\$134,222.45

⁴ Assumes Blended Rate of \$458.41

**ADDITIONAL STAFFING PLANS (INCL. SUB-BUDGETS)
FOR MATTERS JOINTLY PURSUED BY OVERSIGHT BOARD AND COMMITTEE**

Period Covered: July 1, 2020 through July 31, 2020

A. Adversary Proceedings Against Financial Parties, Fuel Oil Defendants, and Other Proceedings

Genovese Joblove & Battista PA., (“GJB” or “Firm”) as the Committee’s special litigation counsel, represents the Committee with respect to two (2) separate adversary proceedings against: (a) numerous underwriters and other financial target parties involved in the issuance of Commonwealth bonds [Adv. Proc. No. 19-280-LTS]; and (b) the claims of PREPA against fuel oil suppliers and laboratories to avoid certain fraudulent transfers [Adv. Pro. No. 19-388-LTS].

Pursuant to the Order entered on December 10, 2019, the litigation in Adv. Proc. No. 19-00388 has been stayed through June 30, 2020 with certain court-imposed obligations prior to that time. The Parties have met and conferred and provide the Court with a Joint Status Report requesting a rescheduling of the status report until July 15, 2020 to permit more clarity regarding the effect of the Covid 19 pandemic. These proceedings are not subject to the Stay Order. Related litigation exists that must be evaluated and considered as it arises.

The stay relating to Adv. Proc. No. 19-280 was set to expire in April 2020, but the March 10, 2020 *Final Order Regarding (A) Stay Period, (B) Mandatory Mediation, and (c) Certain Deadlines Related Thereto* stays the proceedings pending a decision on confirmation. GJB is also involved in the evaluation and if warranted, litigation of, a lawsuit filed by certain monoline insurers to assert claims against the same defendants sued by the Committee in Adv. Proc. No. 19-280-LTS, which monoline suit has been removed to the PROMESA proceedings.

The Firm is reviewing and analyzing additional issues regarding settling bondholders that may result in litigation arising from anticipated confirmation issues.

1. Staffing Plan

Category of timekeeper (using categories maintained by the firm)	Number of timekeepers expected to work on the matter during the budget period	Average hourly rate for period July 1, 2020 through July 31, 2020	Average hourly rate for period July 1, 2020 through July 31, 2020 (net of 20% reduction)
Partner (20+ Years)	2	\$680	\$544
Partner (10+ Years)	2	\$525	\$420
Associate	4	\$375	\$300
Paraprofessionals	2	\$195	\$156

2. Sub-Budget

U.S. Trustee Task Code and Project Category	Estimated Hours for Period July 1, 2020 through July 31, 2020
B191 General Litigation	100
TOTAL HOURS	100

B. Garden-Variety Avoidance Actions

GJB represents the Committee with respect to limited “garden-variety” avoidance actions [Adv. Proc. Nos. 19-267, 19-275-279] against entities that received preferential and fraudulent transfers before the petition date. Casillas, Santiago & Torres LLC, the Committee’s local counsel, represents the Committee with respect to the balance of the “garden-variety” avoidance actions initiated against vendors of the Commonwealth of Puerto Rico [Adv. Proc. Nos. 19-041 to 19-279, Adv. Proc. Nos. 19-347 to 19-354, and additional adversary proceedings to be commenced with respect to PREPA]. However, GJB may, from time-to-time, provide additional assistance to other committee counsel with respect to litigation matters within GJB’s subject matter expertise, but in no way duplicative of the work performed by other counsel on these matters.

On June 7, 2019, the Co-Plaintiffs in these avoidance actions filed a motion [Docket No. 7325] seeking approval of, among other things, procedures establishing a framework for streamlined execution of settlement agreements and procedures and guidelines for resolving the avoidance actions through a voluntary mediation process. On July 12, 2019, the Court entered an “*Order Granting Omnibus Motion by the Financial Oversight and Management Board for Puerto Rico, acting by and through the Members of the Special Claims Committee and the Official Committee of Unsecured Creditors to (i) Establish Litigation Case Management Procedures and (ii) Establish Procedures for Approval of Settlements.*” On December 6, 2019, the Court entered an “*Order Granting Omnibus Motion to Extend Deadlines in Order Granting Omnibus Motion by the Financial Oversight and Management Board for Puerto Rico, acting by and through the Members of the Special Claims Committee and the Official Committee of Unsecured Creditors to (i) Establish Litigation Case Management Procedures and (ii) Establish Procedures for Approval of Settlements.*” Accordingly, the Response Due Date was extended to April 13, 2020, the Motion to Dismiss Response Date was extended to May 13, 2020 and the Reply Deadline was extended to June 13, 2020. Accordingly, GJB anticipates that its workload with respect to “garden-variety” avoidance actions will continue at a reduced level.

1. Staffing Plan

Category of timekeeper (using categories maintained by the firm)	Number of timekeepers expected to work on the matter during the budget period	Average hourly rate for period July 1, 2020 through July 31, 2020	Average hourly rate for period July 1, 2020 through July 31, 2020 (net of 20% reduction)
Partner (20+ Years)	2	\$575	\$460
Partner (10+ Years)	2	\$500	\$400
Associate	2	\$375	\$300
Paraprofessionals	2	\$195	\$156

2. Sub-Budget

U.S. Trustee Task Code and Project Category	Estimated Hours for Period July 1, 2020 through July 31, 2020
B191 General Litigation	10
TOTAL HOURS	10

We also note that, on June 7, 2019, the Co-Plaintiffs in these avoidance actions filed a motion [Docket No. 7325] seeking approval of, among other things, procedures establishing a framework for streamlined execution of settlement agreements and procedures and guidelines for resolving the avoidance actions through a voluntary mediation process. On July 12, 2019, the Court entered an “*Order Granting Omnibus Motion by the Financial Oversight and Management Board for Puerto Rico, acting by and through the Members of the Special Claims Committee and the Official Committee of Unsecured Creditors to (i) Establish Litigation Case Management Procedures and (ii) Establish Procedures for Approval of Settlements.*” On December 6, 2019, the Court entered an “*Order Granting Omnibus Motion to Extend Deadlines in Order Granting Omnibus Motion by the Financial Oversight and Management Board for Puerto Rico, acting by and through the Members of the Special Claims Committee and the Official Committee of Unsecured Creditors to (i) Establish Litigation Case Management Procedures and (ii) Establish Procedures for Approval of Settlements.*” Accordingly, the Response Due Date was extended to May 13, 2020, the Motion to Dismiss Response Date was extended to May 13, 2020 and the Reply Deadline was extended to June 13, 2020. Accordingly, GJB anticipates that its workload with respect to “garden-variety” avoidance actions will be reduced.

C. Currently Stayed Co-Plaintiff Adversary Proceedings

The Committee has been appointed as Co-Plaintiff/Co-Trustee with the Oversight Board or the members of the Special Claims Committee as to certain Adversary Proceedings. GJB represents the Committee as Special Litigation counsel in a subset of these adversary proceedings. Pursuant to the March 10, 2020 Final Order Regarding (A) Stay Period, (B) Mandatory Mediation, and (c) Certain Deadlines Related Thereto the Court extended the stay. These matters are identified as follows:

- Four adversary proceedings seeking, among other things, declaratory judgments that the pertinent challenged GO bonds were issued in violation of the Constitution of Puerto Rico and to recover fraudulent transfers made on account of GO bonds that were not validly issued [Adv. Proc. No. 19-281, Adv. Proc. No. 19-282, Adv. Proc. No. 19-283, and Adv. Proc. No. 19-288]. These matters are stayed pending the decision on the Confirmation of the Amended Plan of Adjustment; and
- One adversary proceedings challenging liens asserted by certain holders of HTA bonds [Adv. Proc. No. 19-364]. These matters remain stayed until such time as the Court orders the stay lifted or a plan of adjustment is confirmed for HTA.

Accordingly, GJB does not expect to expend any significant time on these adversary proceedings during the month of April other than minor administrative and/or procedural work, including responding to inquiries from defendants and assisting Brown Rudnick and Proskauer, in general administration of these cases.

Also, on December 19, 2019, Judge Swain approved a briefing and hearing schedule with respect to motion to dismiss practice related to the GO Lien Challenge. This was stayed pending confirmation of the Amended Plan, pursuant to March 10, 2020 *Final Order Regarding (A) Stay Period, (B) Mandatory Mediation, and (c) Certain Deadlines Related Thereto*. GJB's involvement in the GO Lien Challenge is limited to one adversary listed below.

- One adversary proceeding challenging liens asserted by certain holders of GO bonds Adv. Proc. No. 19-297].

GJB's involvement in the GO Lien Challenge is expected to be minimal.

1. Staffing Plan

Category of timekeeper (using categories maintained by the firm)	Number of timekeepers expected to work on the matter during the budget period	Average hourly rate for period July 1, 2020 through July 31, 2020	Average hourly rate for period July 1, 2020 through July 31, 2020 (net of 20% reduction)
Partner (20+ Years)	2	\$575	\$460
Partner (10+ Years)	2	\$500	\$400

Associate	2	\$375	\$300
Paraprofessionals	2	\$195	\$156

2. Sub-Budget

U.S. Trustee Task Code and Project Category	Estimated Hours for Period July 1, 2020 through July 31, 2020
B191 General Litigation	10
TOTAL HOURS	10

D. ERS Lien Co-Plaintiff Adversary Proceedings

Proskauer Rose LLP, as counsel to the Oversight Board, has primary responsibility for the adversary proceedings seeking, among other things, declarations on the scope of the liens purportedly securing the ERS bonds [Adv. Proc. No. 19-366 and Adv. Proc. No. 19-367]. GJB is counsel of record for the Committee in Adv. Proc. No. 19-367. These matters had been stayed pursuant to the July 25th, 2019 Order, but on October 24, 2019, the Court approved a scheduling order regarding discovery and summary judgment briefing on the lien scope issues and *ultra vires* issues with respect to the ERS bonds and lifted the stay. Accordingly, (a) the lien scope litigation, *i.e.*, Adv. Proc. No. 19-366 and Adv. Proc. No. 19-367 and (b) Count I of the complaints seeking declarations that the pertinent ERS bonds were issued *ultra vires* and, thus, are null and void, *i.e.*, Adv. Proc. No. 19-355, Adv. Proc. No. 19-356, Adv. Proc. No. 19-357, Adv. Proc. No. 19-359, and Adv. Proc. No. 19-361 were unstayed. GJB's involvement in the lien scope litigation is expected to be minimal and limited to Adv. Proc. No. 19-367.

In connection with the *ultra vires* objection to the ERS Bonds, GJB anticipates it will continue to be involved in certain discovery and briefing issues on a limited basis during the month of April.

1. Staffing Plan

Category of timekeeper (using categories maintained by the firm)	Number of timekeepers expected to work on the matter during the budget period	Average hourly rate for period July 1, 2020 through July 31, 2020	Average hourly rate for period July 1, 2020 through July 31, 2020 (net of 20% reduction)
Partner (20+ Years)	2	\$575	\$460
Partner (10+ Years)	2	\$500	\$400
Associate	2	\$375	\$300

Paraprofessionals	2	\$195	\$156
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2. Sub-Budget

U.S. Trustee Task Code and Project Category	Estimated Hours for Period July 1, 2020 through July 31, 2020
B191 General Litigation	5
TOTAL HOURS	5

E. Contested Matters.

GJB represents the Committee with respect to several issues, including the following: the Adversary Defendants motion to participate in the GO Bond Claim Objections (and related mediation process); PREPA 9019 Motion relating to the RSA; and anticipated, litigated contested matters that are currently under advisement by the Committee. GJB anticipates its involvement in the PREPA 9019; GO/PBA Bondholder restructuring deal and amended Plan of Adjustment for the Commonwealth will increase during the month of April as detail review and consideration is given to the impact the New PSA and Amended Plan has on pending litigation.

1. Staffing Plan

Category of timekeeper (using categories maintained by the firm)	Number of timekeepers expected to work on the matter during the budget period	Average hourly rate for period July 1, 2020 through July 31, 2020	Average hourly rate for period July 1, 2020 through July 31, 2020 (net of 20% reduction)
Partner (20+ Years)	3	\$645	\$516
Partner (10+ Years)	2	\$525	\$420
Associate	4	\$375	\$300
Paraprofessionals	2	\$195	\$156

2. Sub-Budget

U.S. Trustee Task Code and Project Category	Estimated Hours for Period July 1, 2020 through July 31, 2020
B190 Other Contested Matters	35
TOTAL HOURS	35

GENERAL STAFFING PLAN

Period Covered: July 1, 2020 through July 31, 2020⁵

Category of timekeeper (using categories maintained by the firm)	Number of timekeepers expected to work on the matter during the budget period	Average hourly rate for period July 1, 2020 through July 31, 2020	Average hourly rate for period July 1, 2020 through July 31, 2020 (net of 20% reduction)
Partner (20+ Years)	5	\$615	\$492
Partner (10+ Years)	2	\$525	\$420
Associate	4	\$375	\$300
Paraprofessionals	2	\$195	\$156

⁵ Unless otherwise indicated in this budget, this proposed staffing plan is based on the following assumptions: (i) no additional title III cases or adversary proceedings will be commenced during the budget period; (ii) no plan of adjustment will be filed during the budget period; (iii) no adversary proceedings will require discovery and trial preparation; and (iv) all adversary proceedings in which the Committee has intervened and/or sought to intervene will only involve briefing and hearings on motions to dismiss and/or pretrial proceedings. In addition, it is impossible to predict how many hours will be required to prosecute contested matters where GJB is asked to participate as conflicts counsel. Thus, this proposed budget may be materially different from the work actually performed. For instance, discovery disputes may lead to extensive litigation. Similarly, the Committee may need to respond to motions that are not and cannot be anticipated. At this time, the proposed budget is speculative. The proposed amended budget has been revised to account for the stay of litigation and other proceedings.

Case Name and Number: 17 BK 3283-LTS (Jointly Administered)
Applicant's Name: Genovese, Joblove & Battista, P.A., as Special Litigation Counsel
to the Official Committee Of Unsecured Creditors
Of The Commonwealth Of Puerto Rico, *et al.*

BUDGET

Period Covered: August 1, 2020 through August 31, 2020¹

U.S. Trustee Task Code and Project Category	Estimated Hours for Period August 1, 2020 through August 31, 2020
<p>B110 Case Administration</p> <p><i>Notes: This task code includes general case strategy and planning, case management, internal Committee matters, internal meetings, and meetings with Paul Hastings.</i></p>	30
<p>B112 General Creditor Inquiries</p> <p><i>Notes: This task code includes responding to and addressing questions and inquiries from creditors.</i></p>	1
<p>B113 Pleadings Review</p> <p><i>Notes: This task code includes review of relevant pleadings in the title III cases as well as all related adversary proceedings. GJB will focus its review on matters that impact its scope of work.</i></p>	20

¹ Unless otherwise indicated, this proposed budget is based on the following assumptions: (i) no additional title III cases or adversary proceedings will be commenced during the budget period; (ii) no new plan of adjustment will be filed during the budget period; (iii) no adversary proceedings will require discovery and trial preparation; and (iv) all adversary proceedings in which the Committee has intervened and/or sought to intervene will only involve briefing and hearings on motions to dismiss, motions to stay, and/or pretrial proceedings. In addition, it is impossible to predict how many hours will be required to prosecute contested matters where GJB is asked to participate as conflicts counsel. Thus, this proposed budget may be materially different from the work actually performed. For instance, discovery disputes may lead to extensive litigation. Similarly, the Committee may need to respond to motions that are not and cannot be anticipated. At this time, the proposed budget is speculative. The proposed budget has been revised to account for the March 10, 2020 Final Order Regarding (A) Stay Period, (B) Mandatory Mediation, and (c) Certain Deadlines Related Thereto, (as amended and modified by subsequent orders) with regard to several adversary proceedings for which the Committee has been appointed as co-plaintiff/co-trustee with the Oversight Board or the members of the Special Claims Committee, as well as the rescheduled PREPA RSA 9019 hearing.

<p>B120 Asset Analysis and Recovery</p> <p><i>Notes: This task code includes review and analysis of the Debtors' assets, including proceeds from insurance policies.</i></p>	<p>0</p>
<p>B130 Asset Disposition</p> <p><i>Notes: This task code includes work related to the Debtors' efforts to sell or otherwise dispose of their assets.</i></p>	<p>0</p>
<p>B140 Relief from Stay / Adequate Protection Proceedings</p> <p><i>Notes: This task code includes work related to motions for relief from stay, including the stay relief motion filed by the ERS bondholders and the receiver motion filed by the PREPA bondholders. GJB is not taking an active role on stay relief requests and its role in this category is limited to instances, if any, where Paul Hastings may have a conflict.</i></p>	<p>0</p>
<p>B150 Meetings of Creditors' Committee and Communications with Creditors</p> <p><i>Notes: This task code includes time spent on telephone conferences, meetings, and other communications with the Committee, including preparation for such calls and meetings. GJB will focus its participation on matters that impact its scope of work and avoid unnecessary duplication with Paul Hastings.</i></p>	<p>20</p>
<p>B155 Court Hearings</p> <p><i>Notes: This task codes includes time spent in court hearings in the title III cases and the related adversary proceedings. This task code also includes time spent preparing for such hearings. GJB will focus its participation on matters that impact its scope of work and avoid unnecessary duplication with Paul Hastings and the Special Claims Committee.</i></p>	<p>20</p>

<p>B160 Employment / Fee Applications</p> <p><i>Notes: This task code includes time spent on complying with the interim compensation order, including preparing GJB's fee statements, as well as responding to inquiries from the fee examiner related thereto.</i></p>	<p>20</p>
<p>B161 Budgeting (Case)</p> <p><i>Notes: This task code includes time spent on preparing GJB's monthly budgets, as required by the fee examiner.</i></p>	<p>2</p>
<p>B165 Fee and Employment Applications of Other Professionals</p> <p><i>Notes: This task code includes time spent on reviewing fee and retention applications of other professionals in these title III cases only as it relates to (i) committee professionals operating at the direction of GJB as conflicts counsel; or (ii) where matters principally handled by GJB are implicated.</i></p>	<p>2</p>
<p>B170 Fee and Employment Objections</p> <p><i>Notes: This task code includes time spent on preparing or responding to objections to fee and retention applications.</i></p>	<p>2</p>
<p>B180 Avoidance Action Analysis</p> <p><i>Notes: This task code includes time spent on analyzing potential claims for avoidance, including preferential transfers and fraudulent transfers as well as requests for settlement that are impacted by such claims. GJB will focus its participation on matters that impact its scope of work and avoid unnecessary duplication with Paul Hastings or other counsel handling such matters for the Committee or the Special Claims Committee, to the extent it is a Co-Plaintiff.</i></p>	<p>15</p>
<p>B185 Assumption / Rejection of Leases and Contracts</p> <p><i>Notes: This task code includes time spent on analyzing issues related to the assumption or rejection of executory contracts and unexpired leases. GJB is role in this category is limited to instances, if any, where Paul Hastings may have a conflict.</i></p>	<p>0</p>

<p>B190 Other Contested Matters</p> <p><i>Notes: This task code includes time spent on all contested matters in the Title III cases. GJB's role in this category is limited to instances, if any, where Paul Hastings may have a conflict. GJB anticipates potential main case litigation concerning matters where Paul Hastings has identified conflicts with parties that may become potentially adverse to the Committee. Further, adverse and interested parties to litigation initiated by GJB on behalf of the Committee have sought to participate in main case issues, including claims objections. Currently, the disputes in which GJB has primary responsibility are limited in scope due to the stay orders in effect..</i></p>	<p>35</p>
<p>191 General Litigation (including Commonwealth litigation, mediation process, and handling of adversary proceedings)</p> <p><i>Notes: GJB anticipates the lifting of the stay of litigation on behalf of PREPA regarding fuel oil claims, which also includes the motion practice relating to the class action plaintiffs' effort to intervene. GJB expects to prepare for the imminent commencement of litigation and discovery.</i></p> <p><i>GJB anticipates primary responsibility regarding an adversary proceeding removed to the PROMESA court regarding monoline insurers' claims against underwriter defendants.</i></p> <p><i>GJB anticipates continued briefing relating to motion practice relating to pending adversary proceedings and continued discovery as to limited issues excepted from the Stay or pursuant to the March 10, 2020 Final Order Regarding (A) Stay Period, (B) Mandatory Mediation, and (c) Certain Deadlines Related Thereto</i></p> <p><i>GJB anticipates continued prosecution of causes of action with the Oversight Board/Special Claims Committee regarding any conflicts regarding prosecution of the ERS lien challenges as modified by the ERS Scheduling Order.</i></p> <p><i>GJB anticipates additional research and analysis regarding potential claims against third parties arising from the PSA</i></p> <p><i>This task code includes time spent on litigation matters,</i></p>	<p>225</p>

<p><i>including all adversary proceedings. We anticipate that work under this task code will including (a) the joint prosecution of causes of action together with Oversight Board/Special Claims Committee in 22 separate lawsuits, and (b) monitoring other adversary proceedings and litigation. GJB's role in this category is limited to those adversary proceedings in which GJB has appeared as and is the lead counsel for the Committee. This role may require coordination with other counsel in related matters concerning global legal issues. Currently, many of these matters are stayed pending confirmation pursuant to Court orders in effect.</i></p>	
<p>B195 Non-Working Travel²</p> <p><i>Notes: This task code includes time spent on non-working travel, including to court hearings and Committee meetings in San Juan, Boston and New York City, although attendance will be limited if required due to a conflict on behalf of Paul Hastings.</i></p>	<p>0</p>
<p>B210 Debtors' Financial Information and Operations/Fiscal Plan</p> <p><i>Notes: This task code includes time spent reviewing and analyzing the Debtors' fiscal plans and related matters. GJB is role in this category is limited to instances, if any, where Paul Hastings may have a conflict or where GJB may need to familiarize itself with matters that may impact litigation where GJB is serving as conflicts counsel to the Committee.</i></p>	<p>20</p>
<p>B220 Employee Benefits/Pensions</p> <p><i>Notes: This task code includes time spent reviewing and analyzing matters related to retiree benefit claims.</i></p>	<p>0</p>
<p>B230 Financing / Cash Collections</p> <p><i>Notes: This task code includes time spent on dealing with the Debtors' requests for financing, most notably the financing sought by PRASA.</i></p>	<p>0</p>

² The firm charges one-half a timekeeper's normal billing rate for any time incurred on account of non-working travel.

<p>B231 Security Document Analysis</p> <p><i>Notes: This task code includes time spent on reviewing and analyzing security documents and results from lien searches.</i></p>	<p>0</p>
<p>B260 Meetings of and Communications with Debtors/Oversight Board</p> <p><i>Notes: This task code includes time spent on meeting and communicating with the Debtors, the Oversight Board, and their respective advisors. GJB anticipates significant collaboration with the Special Claims Committee of the FOMB on matters GJB has appears as conflicts counsel.</i></p>	<p>25</p>
<p>B261 Investigations</p>	<p>0</p>
<p>B310 Claims Administration and Objections</p> <p><i>Notes: This task code includes time spent on matters related to claims administration, including time spent on investigating potential challenges to claims, including, most notably, the challenge to the GO bond claims and the ERS bond claims. This task code also includes time spent on analyzing the pool of unsecured claims against the Debtors. GJB is role in this category is limited to instances, if any, where Paul Hastings may have a conflict.</i></p>	<p>10</p>
<p>B320 Plan and Disclosure Statement</p> <p><i>Notes: This task code includes time spent on matters related to a potential plan of adjustment for the title III Debtors. GJB will focus its participation on matters that impact its scope of work and avoid unnecessary duplication with Paul Hastings. Given the Oversight Board's anticipated filing of an amended Commonwealth plan of adjustment and disclosure statement, GJB anticipates spending time familiarizing itself with matters that may impact litigation where GJB is serving as conflicts counsel to the Committee.</i></p>	<p>65</p>

<p>B420 Restructurings</p> <p><i>Notes: This task code includes time spent on general restructuring matters, including an anticipated amendment Commonwealth Plan of Adjustment and Disclosure Statement, and PREPA RSA (as may be amended) and the related 9019 motion.</i></p> <p><i>GJB anticipates continued involvement in the these matters to the extent that Paul Hastings is conflicted from the representation</i></p>	<p>25</p>
TOTAL HOURS	505
TOTAL ESTIMATED FEE³	\$267,321.33
MINUS 20% REDUCTION	\$53,464.27
TOTAL ESTIMATED FEE (NET OF REDUCTION)	\$213,857.07

³ Assumes Blended Rate of \$515.07

**ADDITIONAL STAFFING PLANS (INCL. SUB-BUDGETS)
FOR MATTERS JOINTLY PURSUED BY OVERSIGHT BOARD AND COMMITTEE**

Period Covered: August 1, 2020 through August 31, 2020

A. Adversary Proceedings Against Financial Parties, Fuel Oil Defendants, and Other Proceedings

Genovese Joblove & Battista PA., (“GJB” or “Firm”) as the Committee’s special litigation counsel, represents the Committee with respect to two (2) separate adversary proceedings against: (a) numerous underwriters and other financial target parties involved in the issuance of Commonwealth bonds [Adv. Proc. No. 19-280-LTS]; and (b) the claims of PREPA against fuel oil suppliers and laboratories to avoid certain fraudulent transfers [Adv. Pro. No. 19-388-LTS].

Pursuant to the Order entered on December 10, 2019, the litigation in Adv. Proc. No. 19-00388 has been stayed through June 30, 2020. The Parties provided the Court with a Joint Status Report requesting a rescheduling of the status report until August 15, 2020 to permit more clarity regarding the effect of the Covid 19 pandemic. These proceedings are not subject to the Stay Order. The Parties intend to submit a Joint Status Report to the Court indicating the lifting of the stay with the intent of re-commencing litigation.

The stay relating to Adv. Proc. No. 19-280 was set to expire in April 2020, but the March 10, 2020 *Final Order Regarding (A) Stay Period, (B) Mandatory Mediation, and (c) Certain Deadlines Related Thereto* stays the proceedings pending a decision on confirmation. GJB is also involved in the evaluation and if warranted, litigation of, a lawsuit filed by certain monoline insurers to assert claims against the same defendants sued by the Committee in Adv. Proc. No. 19-280-LTS, which monoline suit has been removed to the PROMESA proceedings.

GJB is also researching, analyzing, and evaluating additional claims that may be asserted by the Committee

The Firm is reviewing and analyzing additional issues regarding settling bondholders that may result in litigation arising from anticipated confirmation issues.

1. Staffing Plan

Category of timekeeper (using categories maintained by the firm)	Number of timekeepers expected to work on the matter during the budget period	Average hourly rate for period August 1, 2020 through August 31, 2020	Average hourly rate for period August 1, 2020 through August 31, 2020 (net of 20% reduction)
Partner (20+ Years)	2	\$680	\$544
Partner (10+ Years)	2	\$525	\$420

Associate	4	\$375	\$300
Paraprofessionals	2	\$195	\$156

2. Sub-Budget

U.S. Trustee Task Code and Project Category	Estimated Hours for Period August 1, 2020 through August 31, 2020
B191 General Litigation	200
TOTAL HOURS	200

B. Garden-Variety Avoidance Actions

GJB represents the Committee with respect to limited “garden-variety” avoidance actions [Adv. Proc. Nos. 19-267, 19-275-279] against entities that received preferential and fraudulent transfers before the petition date. Casillas, Santiago & Torres LLC, the Committee’s local counsel, represents the Committee with respect to the balance of the “garden-variety” avoidance actions initiated against vendors of the Commonwealth of Puerto Rico [Adv. Proc. Nos. 19-041 to 19-279, Adv. Proc. Nos. 19-347 to 19-354, and additional adversary proceedings to be commenced with respect to PREPA]. However, GJB may, from time-to-time, provide additional assistance to other committee counsel with respect to litigation matters within GJB’s subject matter expertise, but in no way duplicative of the work performed by other counsel on these matters.

On June 7, 2019, the Co-Plaintiffs in these avoidance actions filed a motion [Docket No. 7325] seeking approval of, among other things, procedures establishing a framework for streamlined execution of settlement agreements and procedures and guidelines for resolving the avoidance actions through a voluntary mediation process. On August 12, 2019, the Court entered an “*Order Granting Omnibus Motion by the Financial Oversight and Management Board for Puerto Rico, acting by and through the Members of the Special Claims Committee and the Official Committee of Unsecured Creditors to (i) Establish Litigation Case Management Procedures and (ii) Establish Procedures for Approval of Settlements.*” On December 6, 2019, the Court entered an “*Order Granting Omnibus Motion to Extend Deadlines in Order Granting Omnibus Motion by the Financial Oversight and Management Board for Puerto Rico, acting by and through the Members of the Special Claims Committee and the Official Committee of Unsecured Creditors to (i) Establish Litigation Case Management Procedures and (ii) Establish Procedures for Approval of Settlements.*”

1. Staffing Plan

Category of timekeeper (using categories maintained by the firm)	Number of timekeepers expected to work on the matter during the budget period	Average hourly rate for period August 1, 2020 through August 31, 2020	Average hourly rate for period August 1, 2020 through August 31, 2020 (net of 20% reduction)
Partner (20+ Years)	2	\$575	\$460
Partner (10+ Years)	2	\$500	\$400
Associate	2	\$375	\$300
Paraprofessionals	2	\$195	\$156

2. Sub-Budget

U.S. Trustee Task Code and Project Category	Estimated Hours for Period August 1, 2020 through August 31, 2020
B191 General Litigation	10
TOTAL HOURS	10

C. Currently Stayed Co-Plaintiff Adversary Proceedings

The Committee has been appointed as Co-Plaintiff/Co-Trustee with the Oversight Board or the members of the Special Claims Committee as to certain Adversary Proceedings. GJB represents the Committee as Special Litigation counsel in a subset of these adversary proceedings. Pursuant to the March 10, 2020 Final Order Regarding (A) Stay Period, (B) Mandatory Mediation, and (c) Certain Deadlines Related Thereto the Court extended the stay. These matters are identified as follows:

- Four adversary proceedings seeking, among other things, declaratory judgments that the pertinent challenged GO bonds were issued in violation of the Constitution of Puerto Rico and to recover fraudulent transfers made on account of GO bonds that were not validly issued [Adv. Proc. No. 19-281, Adv. Proc. No. 19-282, Adv. Proc. No. 19-283, and Adv. Proc. No. 19-288]. These matters are stayed pending the decision on the Confirmation of the Amended Plan of Adjustment; and

- One adversary proceedings challenging liens asserted by certain holders of HTA bonds [Adv. Proc. No. 19-364]. These matters remain stayed until such time as the Court orders the stay lifted or a plan of adjustment is confirmed for HTA.

Accordingly, GJB does not expect to expend any significant time on these adversary proceedings during the month of April other than minor administrative and/or procedural work, including responding to inquiries from defendants and assisting Brown Rudnick and Proskauer, in general administration of these cases.

Also, on December 19, 2019, Judge Swain approved a briefing and hearing schedule with respect to motion to dismiss practice related to the GO Lien Challenge. This was stayed pending confirmation of the Amended Plan, pursuant to March 10, 2020 *Final Order Regarding (A) Stay Period, (B) Mandatory Mediation, and (c) Certain Deadlines Related Thereto*. GJB's involvement in the GO Lien Challenge is limited to one adversary listed below.

- One adversary proceeding challenging liens asserted by certain holders of GO bonds Adv. Proc. No. 19-297].

GJB's involvement in the GO Lien Challenge is expected to be minimal.

1. Staffing Plan

Category of timekeeper (using categories maintained by the firm)	Number of timekeepers expected to work on the matter during the budget period	Average hourly rate for period August 1, 2020 through August 31, 2020	Average hourly rate for period August 1, 2020 through August 31, 2020 (net of 20% reduction)
Partner (20+ Years)	2	\$575	\$460
Partner (10+ Years)	2	\$500	\$400
Associate	2	\$375	\$300
Paraprofessionals	2	\$195	\$156

2. Sub-Budget

U.S. Trustee Task Code and Project Category	Estimated Hours for Period August 1, 2020 through August 31, 2020
B191 General Litigation	10
TOTAL HOURS	10

D. ERS Lien Co-Plaintiff Adversary Proceedings

Proskauer Rose LLP, as counsel to the Oversight Board, has primary responsibility for the adversary proceedings seeking, among other things, declarations on the scope of the liens purportedly securing the ERS bonds [Adv. Proc. No. 19-366 and Adv. Proc. No. 19-367]. GJB is counsel of record for the Committee in Adv. Proc. No. 19-367. These matters had been stayed pursuant to the August 25th, 2019 Order, but on October 24, 2019, the Court approved a scheduling order regarding discovery and summary judgment briefing on the lien scope issues and *ultra vires* issues with respect to the ERS bonds and lifted the stay. Accordingly, (a) the lien scope litigation, *i.e.*, Adv. Proc. No. 19-366 and Adv. Proc. No. 19-367 and (b) Count I of the complaints seeking declarations that the pertinent ERS bonds were issued *ultra vires* and, thus, are null and void, *i.e.*, Adv. Proc. No. 19-355, Adv. Proc. No. 19-356, Adv. Proc. No. 19-357, Adv. Proc. No. 19-359, and Adv. Proc. No. 19-361 were unstayed. GJB's involvement in the lien scope litigation is expected to be minimal and limited to Adv. Proc. No. 19-367.

In connection with the *ultra vires* objection to the ERS Bonds, GJB anticipates it will continue to be involved in certain discovery and briefing issues on a limited basis during the month of April.

1. Staffing Plan

Category of timekeeper (using categories maintained by the firm)	Number of timekeepers expected to work on the matter during the budget period	Average hourly rate for period August 1, 2020 through August 31, 2020	Average hourly rate for period August 1, 2020 through August 31, 2020 (net of 20% reduction)
Partner (20+ Years)	2	\$575	\$460
Partner (10+ Years)	2	\$500	\$400
Associate	2	\$375	\$300
Paraprofessionals	2	\$195	\$156

2. Sub-Budget

U.S. Trustee Task Code and Project Category	Estimated Hours for Period August 1, 2020 through August 31, 2020
B191 General Litigation	5
TOTAL HOURS	5

E. Contested Matters.

GJB represents the Committee with respect to several issues, including the following: the Adversary Defendants motion to participate in the GO Bond Claim Objections (and related mediation process); PREPA 9019 Motion relating to the RSA; and anticipated, litigated contested matters that are currently under advisement by the Committee. GJB anticipates its involvement in the PREPA 9019; GO/PBA Bondholder restructuring deal and amended Plan of Adjustment for the Commonwealth will increase during the month of April as detail review and consideration is given to the impact the New PSA and Amended Plan has on pending litigation.

1. Staffing Plan

Category of timekeeper (using categories maintained by the firm)	Number of timekeepers expected to work on the matter during the budget period	Average hourly rate for period August 1, 2020 through August 31, 2020	Average hourly rate for period August 1, 2020 through August 31, 2020 (net of 20% reduction)
Partner (20+ Years)	3	\$645	\$516
Partner (10+ Years)	2	\$525	\$420
Associate	4	\$375	\$300
Paraprofessionals	2	\$195	\$156

2. Sub-Budget

U.S. Trustee Task Code and Project Category	Estimated Hours for Period August 1, 2020 through August 31, 2020
B190 Other Contested Matters	35
TOTAL HOURS	35

GENERAL STAFFING PLAN

Period Covered: August 1, 2020 through August 31, 2020⁴

Category of timekeeper (using categories maintained by the firm)	Number of timekeepers expected to work on the matter during the budget period	Average hourly rate for period August 1, 2020 through August 31, 2020	Average hourly rate for period August 1, 2020 through August 31, 2020 (net of 20% reduction)
Partner (20+ Years)	5	\$615	\$492
Partner (10+ Years)	2	\$525	\$420
Associate	4	\$375	\$300
Paraprofessionals	2	\$195	\$156

⁴ Unless otherwise indicated in this budget, this proposed staffing plan is based on the following assumptions: (i) no additional title III cases or adversary proceedings will be commenced during the budget period; (ii) no plan of adjustment will be filed during the budget period; (iii) no adversary proceedings will require discovery and trial preparation; and (iv) all adversary proceedings in which the Committee has intervened and/or sought to intervene will only involve briefing and hearings on motions to dismiss and/or pretrial proceedings. In addition, it is impossible to predict how many hours will be required to prosecute contested matters where GJB is asked to participate as conflicts counsel. Thus, this proposed budget may be materially different from the work actually performed. For instance, discovery disputes may lead to extensive litigation. Similarly, the Committee may need to respond to motions that are not and cannot be anticipated. At this time, the proposed budget is speculative. The proposed amended budget has been revised to account for the stay of litigation and other proceedings.

EXHIBIT D-2

STAFFING PLAN

Period Covered: February 1, 2020-August 31, 2020

Category of timekeeper (using categories maintained by the firm)	Number of timekeepers expected to work on the matter during the budget period	Average hourly rate for period 02/01/20 through 09/30/20	Average hourly rate for period 02/01/20 through 09/30/20 (net of 20% reduction)
Partner (20+ Years)	5	\$615	\$492
Partner (10+ Years)	2	\$525	\$420
Associate	4	\$375	\$300
Paraprofessionals	2	\$195	\$156

EXHIBIT E

SUMMARY OF COMPENSATION REQUESTED BY PROJECT CATEGORY

EXHIBIT E-1

SUMMARY OF COMPENSATION REQUESTED BY PROJECT CATEGORY

U.S. Trustee Task Code and Project Category								
	February 2020	March 2020	April 2020	May 2020	June 2020	July 2020	August 2020	Total
B110 Case Administration	6.90	17.60	14.10	13.20	9.60	51.80	8.00	121.20
B112 General Creditor Inquiries	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
B113 Pleadings Review	98.60	59.30	74.50	125.90	90.60	0.60	24.50	474.00
B120 Asset Analysis and Recovery	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
B130 Asset Disposition	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
B140 Relief from Stay / Adequate Protection Proceedings	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
B150 Meetings of Creditors' Committee and Communications with Creditors	3.10	6.10	0.00	0.00	3.00	3.20	0.60	16.00
B155 Court Hearings (including Preparation for Court Hearings)	0.80	0.00	0.00	0.10	0.00	2.60	0.00	3.50
B160 Employment / Fee Applications	9.90	31.20	9.10	4.20	7.10	10.20	10.40	82.10
B161 Budgeting (Case)	7.30	5.30	1.60	7.80	1.20	4.90	0.00	28.10
B165 Employment / Fee Applications (Other Professionals)	0.00	0.50	0.30	0.00	0.00	0.00	0.00	0.80
B170 Fee and Employment Objections	0.00	0.00	7.30	0.00	0.00	0.00	0.00	7.30
B180 Avoidance Action Analysis	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
B181 Preference Analysis and Recovery Action	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
B185 Assumption / Rejection of Leases and Contracts	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
B190 Other Contested Matters (including GDB restructuring)	17.00	2.70	0.00	0.70	2.40	0.00	0.00	22.80
B191 General Litigation	370.10	414.70	409.60	108.80	70.00	147.90	194.60	1,715.70
B195 Non-Working Travel	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
B210 Debtors' Financial Information and Operations/Fiscal Plan	0.00	6.30	7.60	0.20	0.30	0.00	0.00	14.40
B220 Employee Benefits / Pensions	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
B230 Financing / Cash Collections	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
B231 Security Document Analysis	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
B260 Meetings of and Communications with Debtors/Oversight Board	0.00	0.00	3.10	3.20	0.00	0.00	2.10	8.40

B261	Investigations	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
B310	Claims Administration and Objections	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
B312	Objections to Claims	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
B320	Plan and Disclosure Statement	35.90	27.30	20.70	7.70	0.00	0.00	0.00	91.60
B321	Business Plan	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
B410	General Bankruptcy Advice/Opinions	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
B420	Restructurings	2.00	0.00	0.00	0.00	0.00	0.00	0.00	2.00
TOTAL HOURS		551.60	571.00	547.90	271.80	184.20	221.20	240.20	2,587.90
TOTAL FEES		\$238,539.50	\$250,466.00	\$249,058.50	\$92,866.50	\$69,628.50	\$107,955.00	\$116,027.50	\$1,124,542.00
MINUS 20% REDUCTION		(\$47,707.90)	(\$50,093.20)	(\$49,811.70)	(\$18,573.30)	(\$13,925.70)	(\$21,591.00)	(\$23,205.50)	(\$224,908.40)
TOTAL FEES (NET OF REDUCTION)		\$190,831.60	\$200,372.80	\$199,246.80	\$74,293.20	\$55,702.80	\$86,364.00	\$92,822.00	\$899,633.60

**FURTHER BREAKDOWN OF COMPENSATION REQUESTED
BY PROJECT CATEGORY AND BY MATTER**

Official Committee of Unsecured Creditors of Commonwealth of PR (Matter ID 001)

U.S. Trustee Task Code and Project Category	Hours Billed	Fees Sought
B110 Case Administration	114.30	\$30,553.00
B113 Pleadings Review	472.50	\$97,999.50
B150 Meeting of Creditors	14.60	\$8,433.00
B155 Court Hearings	3.40	\$1,803.00
B160 Employment / Fee Applications (GJB)	82.15	\$30,664.00
B161 Budgeting (Case)	24.50	\$14,353.50
B165 Employment / Fee Applications (Other Professionals)	0.80	\$460.00
B170 Fee/Employment Objections	7.30	\$4,197.50
B190 Other Contested Matters	9.90	\$4,732.50
B191 General Litigation	1,464.70	\$747,263.50
B210 Debtors' Fiscal Plan	14.10	\$7,065.00
B260 Meetings and Communications with Board	7.80	\$4,485.00
B320 Plan and Disclosure Statement	91.00	\$49,244.50
B420 Restructurings	2.00	\$1,150.00
TOTAL	2,309.00	\$1,002,404.00

PREPA (Matter ID 002)

U.S. Trustee Task Code and Project Category	Hours Billed	Fees Sought
B110 Case Administration	5.50	\$1,794.50
B113 Pleadings Review	1.50	\$406.50
B150 Meeting of Creditors	1.40	\$805.00
B155 Court Hearings	0.10	\$57.50
B161 Budgeting	3.60	\$2,070.00
B190 Other Contested Matters	12.00	\$6,323.00
B191 General Litigation	132.00	\$62,537.50
B210 Debtors' Fiscal Plan	0.30	\$172.50
B260 Meetings and Communications with Board	0.30	\$172.50
B320 Plan and Disclosure Statement	0.40	\$230.00
TOTAL	157.10	\$74,569.00

ERS (Matter ID 003)

U.S. Trustee Task Code and Project Category	Hours Billed	Fees Sought
B110 Case Administration	0.60	\$210.00
B190 Other Contested Matters	0.90	\$472.50
B191 General Litigation	102.30	\$41,505.50
B260 Meetings of and Communications with Board	0.30	\$112.50
B320 Plan and Disclosure Statement	0.20	\$115.00
TOTAL	104.30	\$42,415.50

HTA (Matter ID 004)

U.S. Trustee Task Code and Project Category	Hours Billed	Fees Sought
B110 Case Administration	0.80	\$156.00
B191 General Litigation	16.70	\$4,997.50
TOTAL	2.20	\$5,153.50

Kobre & Kim Report (Matter ID 005)

N/A

EXHIBIT E-2

SUMMARY OF EXPENSE REIMBURSEMENTS REQUESTED BY CATEGORY

Category	Amount
Travel Expenses – Airfare	\$0.00
Travel Expenses – Lodging	\$0.00
Travel Expenses - Taxi / Ground Transportation	\$0.00
Travel Expenses – Parking	\$0.00
Meals (while working on Committee matters)	\$0.00
Court call	\$0.00
Long Distance Phone Calls	\$0.00
Process Service Fee	\$0.00
Messenger	\$0.00
Computer Search	\$2,015.60
Articles and Publications	\$0.00
Court Reporting Services	\$0.00
In-house Black and White Reproduction Charges (21,185 copies at \$0.10 per page)	\$1,577.35
Outside Photocopies	\$0.00
Outside Professional Services	\$0.00
Postage/Express Mail	\$0.00
Data Management/Web Hosting	\$49,992.47
Miscellaneous- Translation/Interpreting Service	\$3,101.76
TOTAL	\$56,687.18

EXHIBIT F

**BREAKDOWN OF COMPENSATION AND EXPENSE REIMBURSEMENT AND BY
WHETHER SERVICES WERE RENDERED IN PUERTO RICO OR OUTSIDE
PUERTO RICO**

February 2020 Fee Statement

	Fees	20% Discount	Fees Requested to Be Paid (90%)	Expenses Requested to Be Paid (100%)	Total Fees & Expenses Requested to Be Paid
Total for Commonwealth (all outside of Puerto Rico)	\$216,770.50	\$173,416.40 (\$43,354.10)	\$156,074.76	\$7,305.33	\$163,380.09
Total for PREPA (all outside of Puerto Rico)	\$9,722.50	\$7,778.00 (\$1,944.50)	\$7,000.20	\$8.55	\$7,008.75
Total for ERS (all outside of Puerto Rico)	\$10,701.50	\$8,561.20 (\$2,140.30)	\$7,705.08	\$32.70	\$7,737.78
Total for HTA (all outside of Puerto Rico)	\$1,345.00	\$1,076.00 (\$269.00)	\$968.40	\$0.00	\$968.40
Grand Total	\$238,539.50	\$190,831.16	\$171,748.44	\$7,346.58	\$179,095.02

March 2020 Fee Statement

	Fees	20% Discount	Fees Requested to Be Paid (90%)	Expenses Requested to Be Paid (100%)	Total Fees & Expenses Requested to Be Paid
Total for Commonwealth (all outside of Puerto Rico)	\$239,853.50	\$191,882.80 (\$47,970.70)	\$172,694.52	\$5,257.86	\$177,952.38
Total for PREPA (all outside of Puerto Rico)	\$883.00	\$706.40 (\$176.60)	\$635.76	\$54.40	\$692.16
Total for ERS (all outside of Puerto Rico)	\$8,297.00	\$6,637.60 (\$1,659.40)	\$5,973.84	\$0.00	\$5,973.84
Total for HTA (all outside of Puerto Rico)	\$1,432.50	\$1,146.00 (\$286.50)	\$1,031.40	\$0.00	\$1,031.40
Grand Total	\$250,466.00	\$200,372.80	\$180,355.52	\$5,314.26	\$185,649.78

April 2020 Fee Statement

	Fees	20% Discount	Fees Requested to Be Paid (90%)	Expenses Requested to Be Paid (100%)	Total Fees & Expenses Requested to Be Paid
Total for Commonwealth (all outside of Puerto Rico)	\$228,620.50	\$ 182,896.40 (\$45,724.10)	\$164,606.76	\$7,029.08	\$171,635.84
Total for PREPA (all outside of Puerto Rico)	\$13,899.00	\$11,119.20 (\$2,779.80)	\$10,007.28	\$0.00	\$10,007.28
Total for ERS (all outside of Puerto Rico)	\$6,363.50	\$5,090.80 (\$ 1,272.70)	\$4,581.72	\$0.00	\$4,581.72
Total for HTA (all outside of Puerto Rico)	\$175.50	\$140.40 (\$35.10)	\$126.36	\$0.00	\$126.36
Grand Total	\$249,058.50	\$199,246.80	\$179,322.12	\$7,029.08	\$186,351.20

May 2020 Fee Statement

	Fees	20% Discount	Fees Requested to Be Paid (90%)	Expenses Requested to Be Paid (100%)	Total Fees & Expenses Requested to Be Paid
Total for Commonwealth (all outside of Puerto Rico)	\$75,162.50	\$60,130.00 (\$15,032.50)	\$54,117.00	\$7,029.08	\$61,146.08
Total for PREPA (all outside of Puerto Rico)	\$12,190.50	\$9,752.40 (\$2,438.10)	\$8,777.16	\$0.00	\$8,777.16
Total for ERS (all outside of Puerto Rico)	\$4,352.50	\$3,626.00 (\$906.50)	\$3,263.40	\$0.00	\$3,263.40
Total for HTA (all outside of Puerto Rico)	\$981.00	\$784.80 (\$196.20)	\$706.32	\$0.00	\$706.32
Grand Total	\$92,866.50	\$74,293.20	\$66,863.88	\$7,029.08	\$73,892.96

June 2020 Fee Statement

	Fees	20% Discount	Fees Requested to Be Paid (90%)	Expenses Requested to Be Paid (100%)	Total Fees & Expenses Requested to Be Paid
Total for Commonwealth (all outside of Puerto Rico)	\$57,089.00	\$45,671.20 (\$ 11,417.80)	\$41,104.08	\$15,434.36	\$56,538.44
Total for PREPA (all outside of Puerto Rico)	\$6,618.50	\$5,294.80 (\$1,323.70)	\$4,765.32	\$55.20	\$4,820.52
Total for ERS (all outside of Puerto Rico)	\$5,862.50	\$4,690.00 (\$1,172.50)	\$4,221.00	\$0.00	\$4,221.00
Total for HTA (all outside of Puerto Rico)	\$58.50	\$46.80 (\$11.70)	\$42.12	\$0.00	\$42.12
Grand Total	\$69,628.50	\$55,702.80	\$50,132.52	\$15,489.56	\$65,622.08

July 2020 Fee Statement

	Fees	20% Discount	Fees Requested to Be Paid (90%)	Expenses Requested to Be Paid (100%)	Total Fees & Expenses Requested to Be Paid
Total for Commonwealth (all outside of Puerto Rico)	\$92,304.50	\$73,843.60 (\$18,460.90)	\$66,459.24	\$7,384.90	\$73,844.14
Total for PREPA (all outside of Puerto Rico)	\$10,571.00	\$8,456.80 (\$2,114.20)	\$7,611.12	\$0.00	\$7,611.12
Total for ERS (all outside of Puerto Rico)	\$4,358.50	\$3,486.80 (\$871.70)	\$3,138.12	\$0.00	\$3,138.12
Total for HTA (all outside of Puerto Rico)	\$721.50	\$577.20 (\$144.30)	\$519.48	\$0.00	\$519.48
Grand Total	\$107,955.50	\$86,364.40	\$77,727.96	\$7,384.90	\$85,112.86

August 2020 Fee Statement

	Fees	20% Discount	Fees Requested to Be Paid (90%)	Expenses Requested to Be Paid (100%)	Total Fees & Expenses Requested to Be Paid
Total for Commonwealth (all outside of Puerto Rico)	\$92,603.50	\$74,082.80 (\$18,520.70)	\$66,674.52	\$7,093.72	\$73,768.24
Total for PREPA (all outside of Puerto Rico)	\$20,684.50	\$16,547.60 (\$4,136.90)	\$14,892.84	\$0.00	\$14,894.84
Total for ERS (all outside of Puerto Rico)	\$2,300.00	\$1,840.00 (\$460.00)	\$1,656.00	\$0.00	\$1,656.00
Total for HTA (all outside of Puerto Rico)	\$439.50	\$351.60 (\$87.90)	\$316.44	\$0.00	\$316.44
Grand Total	\$116,027.50	\$92,822.00	\$83,539.50	\$7,093.72	\$90,633.52

SCHEDULE 1

LIST OF PROFESSIONALS BY MATTER

Official Comm. of Unsecured Creditors of Commonwealth of PR (Matter ID 001)

Name	Title or Position	Department, Group, or Section
Genovese, John H.	Partner	Bankruptcy
Arrastia, John	Partner	Litigation
Jacobs, Eric	Partner	Bankruptcy
Suarez, Jesus M.	Partner	Bankruptcy
Friedman, Michael A.	Partner	Bankruptcy
Gayo-Guitian, Mariaelena	Partner	Bankruptcy
Gonzalez, Alfredo L.	Partner	Corporate
Castaldi, Angelo M.	Associate	Litigation
Bado, Jean-Pierre	Associate	Litigation
Sadovnic, Irina R.	Associate	Litigation
Delgado, Joyce A.	Associate	Litigation
Hopkins, Colleen	Paralegal	Bankruptcy
Sardina, Jessey	Paralegal	Bankruptcy
Zamora, Johanna	Paralegal	Bankruptcy
Garcia-Montes, Tricia	Paralegal	Litigation
Siff, Steve	Paralegal	Bankruptcy
Esser, Carolyn	Paralegal	Bankruptcy

PREPA (Matter ID 002)

Name	Title or Position	Department, Group, or Section
Genovese, John H.	Partner	Bankruptcy
Arrastia, John	Partner	Litigation
Gayo-Guitian, Mariaelena	Partner	Bankruptcy
Suarez, Jesus M.	Partner	Bankruptcy
Castaldi, Angelo M.	Associate	Litigation
Sadovnic, Irina R.	Associate	Litigation
Steve Siff	Paralegal	Bankruptcy
Sardina, Jessey	Paralegal	Bankruptcy
Zamora, Johanna	Paralegal	Bankruptcy

ERS (Matter ID 003)

Name	Title or Position	Department, Group, or Section
Arrastia, John	Partner	Litigation
Genovese, John	Partner	Bankruptcy
Gayo-Guitian, Mariaelena	Partner	Bankruptcy
Suarez, Jesus M.	Partner	Bankruptcy
Castaldi, Angelo M.	Associate	Bankruptcy
Sadovnic, Irina R.	Associate	Litigation
Zamora, Johana	Paralegal	Bankruptcy
Sardina, Jessey N.	Paralegal	Bankruptcy

HTA (Matter ID 004)

Name	Title or Position	Department, Group, or Section
Arrastia, John	Partner	Litigation
Genovese, John	Partner	Bankruptcy
Gayo-Guitian, Mariaelena	Partner	Bankruptcy
Castaldi, Angelo M.	Associate	Bankruptcy
Zamora, Johana	Paralegal	Bankruptcy
Sardina, Jessey N.	Paralegal	Bankruptcy

Kobra & Kim Report (Matter ID 005)

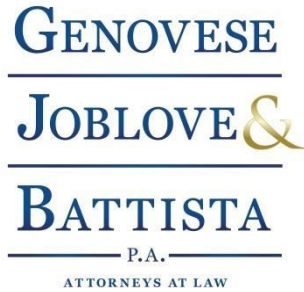
Name	Title or Position	Department, Group, or Section
N/A	N/A	N/A

SCHEDULE 2

**MONTHLY STATEMENTS COVERED IN
APPLICATION**

(attached hereto)

Date	Period Covered	Total Fees	20% Discount	Fees Requested (90%)	Holdback (10%)	Expenses Requested
June 18, 2020	February 1, 2020-February 29, 2020	\$238,539.50	\$190,831.16	\$171,748.44	\$19,082.72	\$7,346.58
August 6, 2020	March 1, 2020-March 31, 2020	\$250,466.00	\$200,372.80	\$180,335.52	\$20,037.28	\$5,314.26
August 6, 2020	April 1, 2020-April 30, 2020	\$249,058.50	\$199,246.80	\$179,322.12	\$19,924.68	\$7,029.08
August 6, 2020	May 1, 2020- May 31, 2020	\$92,866.50	\$74,293.20	\$66,863.88	\$7,729.32	\$7,029.08
August 19, 2020	June 1, 2020-June 30, 2020	\$69,628.50	\$55,702.80	\$50,132.52	\$5,570.28	\$15,489.56
September 17, 2020	July 1, 2020-July 31, 2020	\$107,955.50	\$86,364.40	\$77,727.96	\$8,636.44	\$7,384.90
November 12, 2020	August 1, 2020-August 31, 2020	\$116,027.50	\$92,822.00	\$83,539.80	\$9,282.20	\$7,093.72



June 18, 2020

Via Electronic Mail

The Commonwealth of Puerto Rico
Puerto Rico Fiscal Agency and Financial Advisory Authority
c/o O'Melveny & Myers, LLP
Time Square Tower
7 Times Square
New York, NY 10036

Attn: John J. Rapisardi, Esq., Suzanne Uhland, Esq., Peter Friedman, Esq. and Diana M. Perez, Esq.

**Re: *In re Commonwealth of Puerto Rico, et al.* Case No. 17-BK-3283 (LTS)
(Jointly Administered) –
Genovese, Joblove & Battista, P.A. February 2020 Fee Statement**

Dear Mr. Rapisardi, Ms. Uhland, Mr. Friedman, and Ms. Perez:

By order entered May 31, 2019 (the “Retention Order”), the U.S. District Court for the District of Puerto Rico authorized the employment and retention of Genovese, Joblove & Battista, P.A. (“GJB”) as special litigation counsel to the Official Committee of Unsecured Creditors.

In accordance with the second interim compensation order, dated June 6, 2018 (the “Interim Compensation Order”) please find enclosed copies of GJB’s February 2020 Fee Statement (the “February Fee Statement”) for certain services rendered and expenses incurred during the period ending February 29, 2020.

In accordance with the Interim Compensation Order, I hereby certify that no public servant of the Department of Treasury and no employee of the Puerto Rico Highways and Transportation Authority, the Employees Retirement Systems of the Government of the Commonwealth of Puerto Rico, or the Puerto Rico Electric Power Authority is a party to or has any interest in the gains or benefits derived from the contract that is the basis of this invoice. The only consideration for providing services under the contract is the payment agreed upon with

the Committee.¹ The amount shown on the attached invoices is reasonable. The services were rendered and the corresponding payment has not been made. To the best of my knowledge, GJB does not have any debts owed to the Government of Puerto Rico or its instrumentalities.

Further, in accordance with the Interim Compensation Order, please see attached as ***Exhibit “A”*** the certification authorizing the submission of the February Fee Statement. Also attached hereto as ***Exhibit “B”*** is the related Declaration regarding fees and expenses related to the activities undertaken in Puerto Rico vs. outside of Puerto Rico.

A summary of the breakdown of fees and expenses in the February Fee Statement is provided below for your ease of reference.

1. Commonwealth of Puerto Rico 001 Matter

i. *Services rendered outside of Puerto Rico*

Matter	Matter Name	Invoice Number	Fees	20% Discount (\$43,354.10)	Fees Requested to be Paid (90%)	Expenses Requested to be Paid (100%)	Fees & Expenses Requested to be Paid
12272-001	Promesa Special Conflicts Counsel	97823	\$216,770.50	\$173,416.40	\$156,074.76	\$7,305.33	\$163,380.09

2. Puerto Rico Electric Power Authority (“PREPA”) 002 Matter

i. *Services rendered outside Puerto Rico*

Matter	Matter Name	Invoice Number	Fees	20% Discount (\$1,944.50)	Fees Requested to be Paid (90%)	Expenses Requested to be Paid (100%)	Fees & Expenses Requested to be Paid
12272-002	PREPA Adversary	97820	\$9,722.50	\$7,778.00	\$7,000.20	\$8.55	\$7,008.75

¹ For the avoidance of doubt, in accordance with the Retention Order, the Debtors are responsible for the compensation of GJB’s fees and reimbursement of its expenses, and under no circumstances are the Committee members responsible for payment of GJB’s fees and expenses.

3. Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS”) 003 Matter

i. *Services rendered outside Puerto Rico*

Matter	Matter Name	Invoice Number	Fees	20% Discount (\$2,140.30)	Fees Requested to be Paid (90%)	Expenses Requested to be Paid (100%)	Fees & Expenses Requested to be Paid
12272-003	ERS Litigation	97821	\$10,701.50	\$8,561.20	\$7,705.08	\$32.70	\$7,737.78

4. HTA Litigation- 004 Matter

i. *Services rendered outside Puerto Rico*

Matter	Matter Name	Invoice Number	Fees	20% Discount (\$269.00)	Fees Requested to be Paid (90%)	Expenses Requested to be Paid (100%)	Fees & Expenses Requested to be Paid
12272-004	HTA Litigation	97822	\$1,345.00	\$1,076.00	\$968.40	\$0.00	\$968.40

Under the Retention Order (¶2, page 2), GJB agreed to reduce its regular hourly rates by twenty (20%) percent. The attached invoices reflect the full amount billed by GJB for fees in the amount of \$238,539.50 plus costs of \$7,346.58 for a total of \$245,886.08. The travel times that appear on the invoice have been adjusted to fifty (50%) percent of the billing rate. The twenty (20%) percent discount applied to fees in February is equal to \$47,707.90. The costs are \$7,346.58. Accordingly, GJB seeks payment of \$171,748.44 in fees (90% of the total discounted fees) and \$7,346.58 in costs (100% of the costs) as detailed in the February Fee Statement for a total of \$179,095.02.

Any objections you may have to the February Fee Statement should be served on GJB and the other Notice Parties so as to be received on or before 4:00 pm (Atlantic Standard Time) on the 10th day (or the next business day if such day is not a business day) following service of the February Fee Statement, which is **June 29, 2020** (“Objection Deadline”). If no party serves an objection to the February Statement on GJB and the other Notice Parties attached hereto as ***Exhibit “C”*** so as to be received by the Objection Deadline, GJB respectfully requests payment of \$179,095.02 to the following account:

Wiring and ACH Instructions:

Beneficiary Bank : First Citizens Bank

ABA Number : 053100300

Swift Code : FCBTUS33 (optional)

Account Number: 9063688157

Account Name : Genovese Joblove & Battista, P.A. – Operating Account

Bank Telephone #: 305-447-5050
Bank Address: 3121 Commodore Plaza, Coconut Grove, Florida 33133

If an objection is timely served with respect to the February Fee Statement, GJB requests payment of 90% of the requested fees and 100% of the requested costs that are not subject to such Objection, in accordance with the Interim Compensation Order.

Please let me know if you have any questions regarding any of the foregoing.

Sincerely,

/s/ Mariaelena Gayo- Guitian

Mariaelena Gayo-Guitian, Esq.

Exhibit A

Certification

PRINCIPAL CERTIFICATION

I, Alvin Velazquez, on behalf of the Service Employees International Union, solely in its capacity as a member of the Official Committee of Unsecured Creditors of the Title III Debtors (other than COFINA) (the “Committee”) (and not in its individual capacity), hereby certify that the Committee has approved Genovese Joblove & Battista, P.A.’s February fee statement for certain services rendered and expenses incurred during the period ending February 29, 2020.

/s/ Alvin Velazquez

Name: Alvin Velazquez
Company: Service Employees International
Union
Dated: June 18, 2020

Exhibit B

Tax Declaration

DECLARATION

I, Ken Forrest, hereby declare, under penalty of perjury as follows:

1. I am of legal age, a resident of the United States and Chief Financial Officer of Genovese, Joblove & Battista, P.A., (“GJB” or “Service Provider”) with offices in Florida located at 100 Southeast Second Street, 44th Floor, Miami, Florida 33131 (“Miami” or “Main Office”); 200 East Broward Boulevard, Suite 1110, Fort Lauderdale, Florida 33301 (“Ft. Lauderdale”) and 100 N. Tampa Street, Suite 2600, Tampa, Florida (“Tampa”). GJB also has an affiliate office in Caracas Venezuela located at Av. Francisco de Miranda, Torre Provincial "A" piso 8 oficina 81 y 82 1060 Caracas, Venezuela.

2. The facts set forth in this declaration are based upon my personal knowledge and the firm’s financial records that were reviewed by me or other GJB employees acting under my supervision and direction

3. I submit this declaration in support of the Monthly Fee Statement submitted for payment by GJB for the month of February 2020;

4. GJB is a professional association organized under the laws of the State of Florida in the United States with Employer ID 65-0518134. GJB is not engaged in any trade or business in Puerto Rico.

5. GJB’s taxable year ends on December 31 (the “Tax Year”).

6. GJB does not have an office or other fixed place of business within Puerto Rico, as described under Puerto Rico Treasury Regulation No. 6257.

7. The following fees and expenses relate to activities undertaken outside of Puerto Rico by the Service Provider as part of the PROMESA Title III proceedings during the fee period beginning on February 1, 2020 through February 29, 2020, which constitute gross income from sources outside Puerto Rico pursuant to the Puerto Rico Internal Revenue Code of 2011, as amended (the “Code”):

1. Commonwealth of Puerto Rico 001 Matter

i. *Services rendered outside of Puerto Rico*

Matter	Matter Name	Invoice Number	Fees	20% Discount (\$43,354.10)	Fees Requested to be Paid (90%)	Expenses Requested to be Paid (100%)	Fees & Expenses Requested to be Paid
12272-001	Promesa Special Conflicts Counsel	97823	\$216,770.50	\$173,416.40	\$156,074.76	\$7,305.33	\$163,380.09

2. Puerto Rico Electric Power Authority ("PREPA") 002 Matter

i. *Services rendered outside Puerto Rico*

Matter	Matter Name	Invoice Number	Fees	20% Discount (\$1,944.50)	Fees Requested to be Paid (90%)	Expenses Requested to be Paid (100%)	Fees & Expenses Requested to be Paid
12272-002	PREPA Adversary	97820	\$9,722.50	\$7,778.00	\$7,000.20	\$8.55	\$7,008.75

3. Employees Retirement System of the Government of the Commonwealth of Puerto Rico ("ERS") 003 Matter

i. *Services rendered outside Puerto Rico*

Matter	Matter Name	Invoice Number	Fees	20% Discount (\$2,140.30)	Fees Requested to be Paid (90%)	Expenses Requested to be Paid (100%)	Fees & Expenses Requested to be Paid
12272-003	ERS Litigation	97821	\$10,701.50	\$8,561.20	\$7,705.08	\$32.70	\$7,737.78

4. **HTA Litigation- 004 Matter**

i. *Services rendered outside Puerto Rico*

Matter	Matter Name	Invoice Number	Fees	20% Discount (\$269.00)	Fees Requested to be Paid (90%)	Expenses Requested to be Paid (100%)	Fees & Expenses Requested to be Paid
12272-004	HTA Litigation	97822	\$1,345.00	\$1,076.00	\$968.40	\$0.00	\$968.40

8. The invoices submitted in connection with the February Fee Statement and summarized above reflect the full amount billed by GJB for fees in the amount of \$238,539.50 plus costs of \$7,346.58 for a total of \$245,886.08.

9. That under the GJB's retention order in the Title III cases, GJB agreed to a voluntary 20% reduction in its hourly fees sought to be paid in the amount of \$47,707.90 (20% discount). The costs are \$7,346.58. Accordingly, GJB seeks payment of \$171,748.44 in fees (90% of the total discounted fees) and \$7,346.58 in costs (100% of the costs) as detailed in the February Fee Statement for a total of \$179,095.02.

IN WITNESS WHEREOF, I hereby declare, under penalty of perjury, that the above statement is true and correct on this 29th day of May 2020, in Miami, Florida.



KEN FORREST

Exhibit C

Notice Parties

Counsel for the Oversight Board

Proskauer Rose LLP
Eleven Times Square
New York, NY
10036
Attn: Martin J. Bienenstock, Esq.
Ehud Barak Esq. and

Proskauer Rose LLP,
70 West Madison
Street, Chicago, IL
60602
Attn: Paul V. Possinger, Esq.

and

O'Neill & Borges LLC
250 Mulioz Rivera Ave., Suite 800
San Juan, PR 00918
Attn: Hermann D. Bauer, Esq.

Counsel for the Puerto Rico Fiscal Agency and Financial Advisory Authority

Marini Pietrantonio Muniz
LLC MCS Plaza, Suite 500
255 Ponce de León Ave
San Juan, PR 00917
Attn: Luis C. Marini-Biaggi, Esq.
Carolina Velaz-Rivero Esq.

The Office of the United States Trustee for the District of Puerto Rico

Edificio Ochoa
500 Tanca Street, Suite 301
San Juan, Puerto Rico 00901 (re: In Commonwealth of Puerto Rico)

Counsel for the Official Committee of Unsecured Creditors

Paul Hastings
200 Park Avenue
New York, NY 10166
Attn: Luc A. Despina, Esq.

Counsel for the Official Committee of Unsecured Creditors

Casillas, Santiago & Torres, LLC
El Caribe office Building
53 Palmeras Street, Ste. 1601
San Juan, Puerto Rico 00901
Attn: Juan J . Casillas Ayala, Esq.
Alberto J.E. Aneses Negron, Esq.

Counsel for the Fee Examiner

Godfrey & Kahn S.C.
One East Main Street, Suite 500
Madison, Wisconsin 53703-3300
Attn: Katherine Stadler, Esq.

and

EDGE Legal Strategies, PSG
252 Ponce de Le6n
Avenue Citibank Tower,
12th Floor San Juan, PR
00918
Attn: Eyck O. Luge

U.S. Trustee

Office of the United States Trustee for the District of Puerto Rico
Edificio Ochoa
500 Tanca Street, Suite 301
San Juan, PR 00901 (re: *In re: Commonwealth of Puerto Rico*)

Counsel for the Official Committee of Retired Employees

Jenner & Block LLP
919 Third Ave.
New York, NY 10022
Attn: Robert Gordon, Esq.
Richard Levin, Esq.

and

Jenner & Block LLP
353 N. Clark Street
Chicago, IL 60654
Attn: Catherine Steege, Esq.
Melissa Root, Esq.

and

Bennazar, Garcia & Milian, C.S.P.
Edificio Union Plaza, PH-A,
416 Ave. Ponce de Leon
Hate Rey, PR 00918
Attn: A.J. Bennazar-Zequiera, Esq.

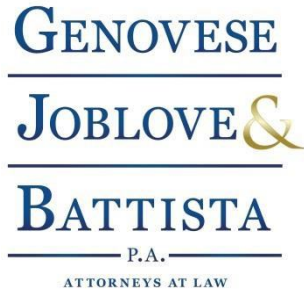
Puerto Rico Department of Treasury

Puerto Rico Department of
Treasury

PO Box 9024140

San Juan, PR 00902-4140

Attn: Reylam Guerra Goderich, Deputy Assistant of Central Accounting
Omar E. Rodriguez Perez, CPA, Assistant Secretary of Central Accounting
Angel L. Pantoja Rodriguez, Deputy Assistant Secretary of Internal Revenue and Tax
Policy
Francisco Pares Alicea, Assistant Secretary of Internal Revenue and Tax Policy
Francisco Pefia Montanez, CPA, Assistant Secretary of the Treasury



August 6, 2020

Via Electronic Mail

The Commonwealth of Puerto Rico
Puerto Rico Fiscal Agency and Financial Advisory Authority
c/o O'Melveny & Myers, LLP
Time Square Tower
7 Times Square
New York, NY 10036

Attn: John J. Rapisardi, Esq., Suzanne Uhland, Esq., Peter Friedman, Esq. and Diana M. Perez, Esq.

**Re: *In re Commonwealth of Puerto Rico, et al.* Case No. 17-BK-3283 (LTS)
(Jointly Administered) –
Genovese, Joblove & Battista, P.A. March 2020 Fee Statement**

Dear Mr. Rapisardi, Ms. Uhland, Mr. Friedman, and Ms. Perez:

By order entered May 31, 2019 (the “Retention Order”), the U.S. District Court for the District of Puerto Rico authorized the employment and retention of Genovese, Joblove & Battista, P.A. (“GJB”) as special litigation counsel to the Official Committee of Unsecured Creditors.

In accordance with the second interim compensation order, dated June 6, 2018 (the “Interim Compensation Order”) please find enclosed copies of GJB’s March 2020 Fee Statement (the “March Fee Statement”) for certain services rendered and expenses incurred during the period ending March 31, 2020.

In accordance with the Interim Compensation Order, I hereby certify that no public servant of the Department of Treasury and no employee of the Puerto Rico Highways and Transportation Authority, the Employees Retirement Systems of the Government of the Commonwealth of Puerto Rico, or the Puerto Rico Electric Power Authority is a party to or has any interest in the gains or benefits derived from the contract that is the basis of this invoice. The only consideration for providing services under the contract is the payment agreed upon with

the Committee.¹ The amount shown on the attached invoices is reasonable. The services were rendered and the corresponding payment has not been made. To the best of my knowledge, GJB does not have any debts owed to the Government of Puerto Rico or its instrumentalities.

Further, in accordance with the Interim Compensation Order, please see attached as ***Exhibit “A”*** the certification authorizing the submission of the March Fee Statement. Also attached hereto as ***Exhibit “B”*** is the related Declaration regarding fees and expenses related to the activities undertaken in Puerto Rico vs. outside of Puerto Rico.

A summary of the breakdown of fees and expenses in the March Fee Statement is provided below for your ease of reference.

1. Commonwealth of Puerto Rico 001 Matter

i. *Services rendered outside of Puerto Rico*

Matter	Matter Name	Invoice Number	Fees	20% Discount (\$47,970.70)	Fees Requested to be Paid (90%)	Expenses Requested to be Paid (100%)	Fees & Expenses Requested to be Paid
12272-001	Promesa Special Conflicts Counsel	98307	\$239,853.50	\$191,882.80	\$172,694.52	\$5,257.86	\$177,952.38

2. Puerto Rico Electric Power Authority (“PREPA”) 002 Matter

i. *Services rendered outside Puerto Rico*

Matter	Matter Name	Invoice Number	Fees	20% Discount (\$176.60)	Fees Requested to be Paid (90%)	Expenses Requested to be Paid (100%)	Fees & Expenses Requested to be Paid
12272-002	PREPA Adversary	98304	\$883.00	\$706.40	\$635.76	\$56.40	\$692.16

¹ For the avoidance of doubt, in accordance with the Retention Order, the Debtors are responsible for the compensation of GJB’s fees and reimbursement of its expenses, and under no circumstances are the Committee members responsible for payment of GJB’s fees and expenses.

3. Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS”) 003 Matter

i. *Services rendered outside Puerto Rico*

Matter	Matter Name	Invoice Number	Fees	20% Discount (\$1,659.40)	Fees Requested to be Paid (90%)	Expenses Requested to be Paid (100%)	Fees & Expenses Requested to be Paid
12272-003	ERS Litigation	98305	\$8,297.00	\$6,637.60	\$5,973.84	\$0.00	\$5,973.84

4. HTA Litigation- 004 Matter

i. *Services rendered outside Puerto Rico*

Matter	Matter Name	Invoice Number	Fees	20% Discount (\$286.50)	Fees Requested to be Paid (90%)	Expenses Requested to be Paid (100%)	Fees & Expenses Requested to be Paid
12272-004	HTA Litigation	98306	\$1,432.50	\$1,146.00	\$1,031.40	\$0.00	\$1,031.40

Under the Retention Order (¶2, page 2), GJB agreed to reduce its regular hourly rates by twenty (20%) percent. The attached invoices reflect the full amount billed by GJB for fees in the amount of \$250,466.00 plus costs of \$5,314.26 for a total of \$255,780.26. The travel times that appear on the invoice have been adjusted to fifty (50%) percent of the billing rate. The twenty (20%) percent discount applied to fees in March is equal to \$50,093.20. The costs are \$5,314.26. Accordingly, GJB seeks payment of \$180,335.52 in fees (90% of the total discounted fees) and \$5,314.26 in costs (100% of the costs) as detailed in the March Fee Statement for a total of \$185,649.78.

Any objections you may have to the March Fee Statement should be served on GJB and the other Notice Parties so as to be received on or before 4:00 pm (Atlantic Standard Time) on the 10th day (or the next business day if such day is not a business day) following service of the March Fee Statement, which is **August 17, 2020** (“Objection Deadline”). If no party serves an objection to the March Statement on GJB and the other Notice Parties attached hereto as ***Exhibit “C”*** so as to be received by the Objection Deadline, GJB respectfully requests payment of \$185,649.78 to the following account:

Wiring and ACH Instructions:

Beneficiary Bank : First Citizens Bank

ABA Number : 053100300

Swift Code : FCBTUS33 (optional)

Account Number: 9063688157

Account Name : Genovese Joblove & Battista, P.A. – Operating Account

Bank Telephone #: 305-447-5050

Bank Address: 3121 Commodore Plaza, Coconut Grove, Florida 33133

If an objection is timely served with respect to the March Fee Statement, GJB requests payment of 90% of the requested fees and 100% of the requested costs that are not subject to such Objection, in accordance with the Interim Compensation Order.

Please let me know if you have any questions regarding any of the foregoing.

Sincerely,

/s/ Mariaelena Gayo- Guitian

Mariaelena Gayo-Guitian, Esq.

Exhibit A

Certification

PRINCIPAL CERTIFICATION

I, Alvin Velazquez, on behalf of the Service Employees International Union, solely in its capacity as a member of the Official Committee of Unsecured Creditors of the Title III Debtors (other than COFINA) (the “Committee”) (and not in its individual capacity), hereby certify that the Committee has approved Genovese Joblove & Battista, P.A.’s March fee statement for certain services rendered and expenses incurred during the period ending March 31, 2020.

/s/ Alvin Velazquez

Name: Alvin Velazquez
Company: Service Employees International Union
Dated: August 6, 2020

Exhibit B

Tax Declaration

DECLARATION

I, Ken Forrest, hereby declare, under penalty of perjury as follows:

1. I am of legal age, a resident of the United States and Chief Financial Officer of Genovese, Joblove & Battista, P.A., ("GJB" or "Service Provider") with offices in Florida located at 100 Southeast Second Street, 44th Floor, Miami, Florida 33131 ("Miami" or "Main Office"); 200 East Broward Boulevard, Suite 1110, Fort Lauderdale, Florida 33301 ("Ft. Lauderdale") and 100 N. Tampa Street, Suite 2600, Tampa, Florida ("Tampa"). GJB also has an affiliate office in Caracas Venezuela located at Av. Francisco de Miranda, Torre Provincial "A" piso 8 oficina 81 y 82 1060 Caracas, Venezuela.
2. The facts set forth in this declaration are based upon my personal knowledge and the firm's financial records that were reviewed by me or other GJB employees acting under my supervision and direction
3. I submit this declaration in support of the Monthly Fee Statement submitted for payment by GJB for the month of March 2020;
4. GJB is a professional association organized under the laws of the State of Florida in the United States with Employer ID 65-0518134. GJB is not engaged in any trade or business in Puerto Rico.
5. GJB's taxable year ends on December 31 (the "Tax Year").
6. GJB does not have an office or other fixed place of business within Puerto Rico, as described under Puerto Rico Treasury Regulation No. 6257.
7. The following fees and expenses relate to activities undertaken outside of Puerto Rico by the Service Provider as part of the PROMESA Title III proceedings during the fee period beginning on March 1, 2020 through March 31, 2020, which constitute gross income from sources outside Puerto Rico pursuant to the Puerto Rico Internal Revenue Code of 2011, as amended (the "Code");

1. **Commonwealth of Puerto Rico 001 Matter**

i. *Services rendered outside of Puerto Rico*

Matter	Matter Name	Invoice Number	Fees	20% Discount (\$47,970.70)	Fees Requested to be Paid (90%)	Expenses Requested to be Paid (100%)	Fees & Expenses Requested to be Paid
12272-001	Promesa Special Conflicts Counsel	98307	\$239,853.50	\$191,882.80	\$172,694.52	\$5,257.86	\$177,952.38

2. **Puerto Rico Electric Power Authority ("PREPA") 002 Matter**

i. *Services rendered outside Puerto Rico*

Matter	Matter Name	Invoice Number	Fees	20% Discount (\$176.60)	Fees Requested to be Paid (90%)	Expenses Requested to be Paid (100%)	Fees & Expenses Requested to be Paid
12272-002	PREPA Adversary	98304	\$883.00	\$706.40	\$635.76	\$56.40	\$692.16

3. **Employees Retirement System of the Government of the Commonwealth of Puerto Rico ("ERS") 003 Matter**

i. *Services rendered outside Puerto Rico*

Matter	Matter Name	Invoice Number	Fees	20% Discount (\$1,659.40)	Fees Requested to be Paid (90%)	Expenses Requested to be Paid (100%)	Fees & Expenses Requested to be Paid
12272-003	ERS Litigation	98305	\$8,297.00	\$6,637.60	\$5,973.84	\$0.00	\$5,973.84

4. **HTA Litigation- 004 Matter**

i. *Services rendered outside Puerto Rico*

Matter	Matter Name	Invoice Number	Fees	20% Discount (\$286.50)	Fees Requested to be Paid (90%)	Expenses Requested to be Paid (100%)	Fees & Expenses Requested to be Paid
12272-004	HTA Litigation	98306	\$1,432.50	\$1,146.00	\$1,031.40	\$0.00	\$1,031.40

8. The invoices submitted in connection with the March Fee Statement and summarized above reflect the full amount billed by GJB for fees in the amount of \$250,466.00 plus costs of \$5,314.26 for a total of \$255,780.26.

9. That under the GJB's retention order in the Title III cases, GJB agreed to a voluntary 20% reduction in its hourly fees sought to be paid in the amount of \$50,093.20 (20% discount). The costs are \$5,314.26. Accordingly, GJB seeks payment of \$180,335.52 in fees (90% of the total discounted fees) and \$5,314.26 in costs (100% of the costs) as detailed in the February Fee Statement for a total of \$185,649.78.

IN WITNESS WHEREOF, I hereby declare, under penalty of perjury, that the above statement is true and correct on this 6th day of August 2020, in Miami, Florida.



KEN FORREST

Exhibit C

Notice Parties

Counsel for the Oversight Board

Proskauer Rose LLP
Eleven Times Square
New York, NY
10036
Attn: Martin J. Bienenstock, Esq.
Ehud Barak Esq. and

Proskauer Rose LLP,
70 West Madison
Street, Chicago, IL
60602
Attn: Paul V. Possinger, Esq.

and

O'Neill & Borges LLC
250 Mulioz Rivera Ave., Suite 800
San Juan, PR 00918
Attn: Hermann D. Bauer, Esq.

Counsel for the Puerto Rico Fiscal Agency and Financial Advisory Authority

Marini Pietrantonio Muniz
LLC MCS Plaza, Suite 500
255 Ponce de León Ave
San Juan, PR 00917
Attn: Luis C. Marini-Biaggi, Esq.
Carolina Velaz-Rivero Esq.

The Office of the United States Trustee for the District of Puerto Rico

Edificio Ochoa
500 Tanca Street, Suite 301
San Juan, Puerto Rico 00901 (re: In Commonwealth of Puerto Rico)

Counsel for the Official Committee of Unsecured Creditors

Paul Hastings
200 Park Avenue
New York, NY 10166
Attn: Luc A. Despina, Esq.

Counsel for the Official Committee of Unsecured Creditors

Casillas, Santiago & Torres, LLC
El Caribe office Building
53 Palmeras Street, Ste. 1601
San Juan, Puerto Rico 00901
Attn: Juan J . Casillas Ayala, Esq.
Alberto J.E. Aneses Negron, Esq.

Counsel for the Fee Examiner

Godfrey & Kahn S.C.
One East Main Street, Suite 500
Madison, Wisconsin 53703-3300
Attn: Katherine Stadler, Esq.

and

EDGE Legal Strategies, PSG
252 Ponce de Le6n
Avenue Citibank Tower,
12th Floor San Juan, PR
00918
Attn: Eyck O. Luge

U.S. Trustee

Office of the United States Trustee for the District of Puerto Rico
Edificio Ochoa
500 Tanca Street, Suite 301
San Juan, PR 00901 (re: *In re: Commonwealth of Puerto Rico*)

Counsel for the Official Committee of Retired Employees

Jenner & Block LLP
919 Third Ave.
New York, NY 10022
Attn: Robert Gordon, Esq.
Richard Levin, Esq.

and

Jenner & Block LLP
353 N. Clark Street
Chicago, IL 60654
Attn: Catherine Steege, Esq.
Melissa Root, Esq.

and

Bennazar, Garcia & Milian, C.S.P.
Edificio Union Plaza, PH-A,
416 Ave. Ponce de Leon
Hate Rey, PR 00918
Attn: A.J. Bennazar-Zequiera, Esq.

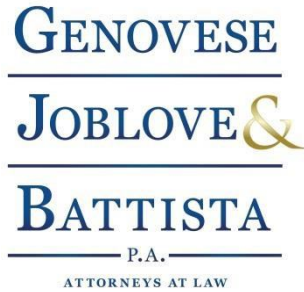
Puerto Rico Department of Treasury

Puerto Rico Department of
Treasury

PO Box 9024140

San Juan, PR 00902-4140

Attn: Reylam Guerra Goderich, Deputy Assistant of Central Accounting
Omar E. Rodriguez Perez, CPA, Assistant Secretary of Central Accounting
Angel L. Pantoja Rodriguez, Deputy Assistant Secretary of Internal Revenue and Tax
Policy
Francisco Pares Alicea, Assistant Secretary of Internal Revenue and Tax Policy
Francisco Pefia Montanez, CPA, Assistant Secretary of the Treasury



August 6, 2020

Via Electronic Mail

The Commonwealth of Puerto Rico
Puerto Rico Fiscal Agency and Financial Advisory Authority
c/o O'Melveny & Myers, LLP
Time Square Tower
7 Times Square
New York, NY 10036

Attn: John J. Rapisardi, Esq., Suzanne Uhland, Esq., Peter Friedman, Esq. and Diana M. Perez, Esq.

**Re: *In re Commonwealth of Puerto Rico, et al.* Case No. 17-BK-3283 (LTS)
(Jointly Administered) –
Genovese, Joblove & Battista, P.A. April 2020 Fee Statement**

Dear Mr. Rapisardi, Ms. Uhland, Mr. Friedman, and Ms. Perez:

By order entered May 31, 2019 (the “Retention Order”), the U.S. District Court for the District of Puerto Rico authorized the employment and retention of Genovese, Joblove & Battista, P.A. (“GJB”) as special litigation counsel to the Official Committee of Unsecured Creditors.

In accordance with the second interim compensation order, dated June 6, 2018 (the “Interim Compensation Order”) please find enclosed copies of GJB’s April 2020 Fee Statement (the “April Fee Statement”) for certain services rendered and expenses incurred during the period ending April 30, 2020.

In accordance with the Interim Compensation Order, I hereby certify that no public servant of the Department of Treasury and no employee of the Puerto Rico Highways and Transportation Authority, the Employees Retirement Systems of the Government of the Commonwealth of Puerto Rico, or the Puerto Rico Electric Power Authority is a party to or has any interest in the gains or benefits derived from the contract that is the basis of this invoice. The only consideration for providing services under the contract is the payment agreed upon with

the Committee.¹ The amount shown on the attached invoices is reasonable. The services were rendered and the corresponding payment has not been made. To the best of my knowledge, GJB does not have any debts owed to the Government of Puerto Rico or its instrumentalities.

Further, in accordance with the Interim Compensation Order, please see attached as ***Exhibit “A”*** the certification authorizing the submission of the April Fee Statement. Also attached hereto as ***Exhibit “B”*** is the related Declaration regarding fees and expenses related to the activities undertaken in Puerto Rico vs. outside of Puerto Rico.

A summary of the breakdown of fees and expenses in the April Fee Statement is provided below for your ease of reference.

1. Commonwealth of Puerto Rico 001 Matter

i. *Services rendered outside of Puerto Rico*

Matter	Matter Name	Invoice Number	Fees	20% Discount (\$45,724.10)	Fees Requested to be Paid (90%)	Expenses Requested to be Paid (100%)	Fees & Expenses Requested to be Paid
12272-001	Promesa Special Conflicts Counsel	98308	\$228,620.50	\$182,896.40	\$164,606.76	\$7,029.08	\$171,635.84

2. Puerto Rico Electric Power Authority (“PREPA”) 002 Matter

i. *Services rendered outside Puerto Rico*

Matter	Matter Name	Invoice Number	Fees	20% Discount (\$2,779.80)	Fees Requested to be Paid (90%)	Expenses Requested to be Paid (100%)	Fees & Expenses Requested to be Paid
12272-002	PREPA Adversary	98309	\$13,899.00	\$11,119.20	\$10,007.28	\$0.00	\$10,007.28

¹ For the avoidance of doubt, in accordance with the Retention Order, the Debtors are responsible for the compensation of GJB’s fees and reimbursement of its expenses, and under no circumstances are the Committee members responsible for payment of GJB’s fees and expenses.

3. Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS”) 003 Matter

i. *Services rendered outside Puerto Rico*

Matter	Matter Name	Invoice Number	Fees	20% Discount (\$1,272.70)	Fees Requested to be Paid (90%)	Expenses Requested to be Paid (100%)	Fees & Expenses Requested to be Paid
12272-003	ERS Litigation	98310	6,363.50	5,090.80	\$4,581.72	\$0.00	\$4,581.72

4. HTA Litigation- 004 Matter

i. *Services rendered outside Puerto Rico*

Matter	Matter Name	Invoice Number	Fees	20% Discount (\$35.10)	Fees Requested to be Paid (90%)	Expenses Requested to be Paid (100%)	Fees & Expenses Requested to be Paid
12272-004	HTA Litigation	98311	\$175.50	\$140.40	\$126.36	\$0.00	\$126.36

Under the Retention Order (¶2, page 2), GJB agreed to reduce its regular hourly rates by twenty (20%) percent. The attached invoices reflect the full amount billed by GJB for fees in the amount of \$249,058.50 plus costs of \$7,029.08 for a total of \$256,087.58. The travel times that appear on the invoice have been adjusted to fifty (50%) percent of the billing rate. The twenty (20%) percent discount applied to fees in April is equal to \$49,811.70. The costs are \$7,029.08. Accordingly, GJB seeks payment of \$179,322.12 in fees (90% of the total discounted fees) and \$7,029.08 in costs (100% of the costs) as detailed in the April Fee Statement for a total of \$186,351.20.

Any objections you may have to the April Fee Statement should be served on GJB and the other Notice Parties so as to be received on or before 4:00 pm (Atlantic Standard Time) on the 10th day (or the next business day if such day is not a business day) following service of the April Fee Statement, which is **August 17, 2020** (“Objection Deadline”). If no party serves an objection to the April Statement on GJB and the other Notice Parties attached hereto as ***Exhibit “C”*** so as to be received by the Objection Deadline, GJB respectfully requests payment of \$186,351.20 to the following account:

Wiring and ACH Instructions:

Beneficiary Bank : First Citizens Bank

ABA Number : 053100300

Swift Code : FCBTUS33 (optional)

Account Number: 9063688157

Account Name : Genovese Joblove & Battista, P.A. – Operating Account

Bank Telephone #: 305-447-5050

Bank Address: 3121 Commodore Plaza, Coconut Grove, Florida 33133

If an objection is timely served with respect to the April Fee Statement, GJB requests payment of 90% of the requested fees and 100% of the requested costs that are not subject to such Objection, in accordance with the Interim Compensation Order.

Please let me know if you have any questions regarding any of the foregoing.

Sincerely,

/s/ Mariaelena Gayo- Guitian

Mariaelena Gayo-Guitian, Esq.

Exhibit A

Certification

PRINCIPAL CERTIFICATION

I, Alvin Velazquez, on behalf of the Service Employees International Union, solely in its capacity as a member of the Official Committee of Unsecured Creditors of the Title III Debtors (other than COFINA) (the “Committee”) (and not in its individual capacity), hereby certify that the Committee has approved Genovese Joblove & Battista, P.A.’s April fee statement for certain services rendered and expenses incurred during the period ending February 30, 2020.

/s/ Alvin Velazquez

Name: Alvin Velazquez
Company: Service Employees International
Union
Dated: August 6, 2020

Exhibit B

Tax Declaration

DECLARATION

I, Ken Forrest, hereby declare, under penalty of perjury as follows:

1. I am of legal age, a resident of the United States and Chief Financial Officer of Genovese, Joblove & Battista, P.A., ("GJB" or "Service Provider") with offices in Florida located at 100 Southeast Second Street, 44th Floor, Miami, Florida 33131 ("Miami" or "Main Office"); 200 East Broward Boulevard, Suite 1110, Fort Lauderdale, Florida 33301 ("Ft. Lauderdale") and 100 N. Tampa Street, Suite 2600, Tampa, Florida ("Tampa"). GJB also has an affiliate office in Caracas Venezuela located at Av. Francisco de Miranda, Torre Provincial "A" piso 8 oficina 81 y 82 1060 Caracas, Venezuela.
2. The facts set forth in this declaration are based upon my personal knowledge and the firm's financial records that were reviewed by me or other GJB employees acting under my supervision and direction
3. I submit this declaration in support of the Monthly Fee Statement submitted for payment by GJB for the month of April 2020;
4. GJB is a professional association organized under the laws of the State of Florida in the United States with Employer ID 65-0518134. GJB is not engaged in any trade or business in Puerto Rico.
5. GJB's taxable year ends on December 31 (the "Tax Year").
6. GJB does not have an office or other fixed place of business within Puerto Rico, as described under Puerto Rico Treasury Regulation No. 6257.
7. The following fees and expenses relate to activities undertaken outside of Puerto Rico by the Service Provider as part of the PROMESA Title III proceedings during the fee period beginning on April 1, 2020 through April 30, 2020, which constitute gross income from sources outside Puerto Rico pursuant to the Puerto Rico Internal Revenue Code of 2011, as amended (the "Code");

1. **Commonwealth of Puerto Rico 001 Matter**

i. *Services rendered outside of Puerto Rico*

Matter	Matter Name	Invoice Number	Fees	20% Discount (\$45,724.10)	Fees Requested to be Paid (90%)	Expenses Requested to be Paid (100%)	Fees & Expenses Requested to be Paid
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2. **Puerto Rico Electric Power Authority ("PREPA") 002 Matter**

i. *Services rendered outside Puerto Rico*

Matter	Matter Name	Invoice Number	Fees	20% Discount (\$2,779.80)	Fees Requested to be Paid (90%)	Expenses Requested to be Paid (100%)	Fees & Expenses Requested to be Paid
12272-002	PREPA Adversary	98309	\$13,899.00	\$11,119.20	\$10,007.28	\$0.00	\$10,007.28

3. **Employees Retirement System of the Government of the Commonwealth of Puerto Rico ("ERS") 003 Matter**

i. *Services rendered outside Puerto Rico*

Matter	Matter Name	Invoice Number	Fees	20% Discount (\$1,272.70)	Fees Requested to be Paid (90%)	Expenses Requested to be Paid (100%)	Fees & Expenses Requested to be Paid
12272-003	ERS Litigation	98310	6,363.50	5,090.80	\$4,581.72	\$0.00	\$4,581.72

4. **HTA Litigation- 004 Matter**

i. *Services rendered outside Puerto Rico*

Matter	Matter Name	Invoice Number	Fees	20% Discount (\$35.10)	Fees Requested to be Paid (90%)	Expenses Requested to be Paid (100%)	Fees & Expenses Requested to be Paid
12272-004	HTA Litigation	98311	\$175.50	\$140.40	\$126.36	\$0.00	\$126.36

8. The invoices submitted in connection with the April Fee Statement and summarized above reflect the full amount billed by GJB for fees in the amount of \$249,058.50 plus costs of \$7,029.08 for a total of \$256,087.58.

9. That under the GJB's retention order in the Title III cases, GJB agreed to a voluntary 20% reduction in its hourly fees sought to be paid in the amount of \$49,811.70 (20% discount). The costs are \$7,029.08. Accordingly, GJB seeks payment of \$179,322.12 in fees (90% of the total discounted fees) and \$7,029.08 in costs (100% of the costs) as detailed in the April Fee Statement for a total of \$186,351.20.

IN WITNESS WHEREOF, I hereby declare, under penalty of perjury, that the above statement is true and correct on this 6th day of August 2020, in Miami, Florida.



KEN FORREST

Exhibit C

Notice Parties

Counsel for the Oversight Board

Proskauer Rose LLP
Eleven Times Square
New York, NY
10036
Attn: Martin J. Bienenstock, Esq.
Ehud Barak Esq. and

Proskauer Rose LLP,
70 West Madison
Street, Chicago, IL
60602
Attn: Paul V. Possinger, Esq.

and

O'Neill & Borges LLC
250 Mulioz Rivera Ave., Suite 800
San Juan, PR 00918
Attn: Hermann D. Bauer, Esq.

Counsel for the Puerto Rico Fiscal Agency and Financial Advisory Authority

Marini Pietrantonio Muniz
LLC MCS Plaza, Suite 500
255 Ponce de León Ave
San Juan, PR 00917
Attn: Luis C. Marini-Biaggi, Esq.
Carolina Velaz-Rivero Esq.

The Office of the United States Trustee for the District of Puerto Rico

Edificio Ochoa
500 Tanca Street, Suite 301
San Juan, Puerto Rico 00901 (re: In Commonwealth of Puerto Rico)

Counsel for the Official Committee of Unsecured Creditors

Paul Hastings
200 Park Avenue
New York, NY 10166
Attn: Luc A. Despina, Esq.

Counsel for the Official Committee of Unsecured Creditors

Casillas, Santiago & Torres, LLC
El Caribe office Building
53 Palmeras Street, Ste. 1601
San Juan, Puerto Rico 00901
Attn: Juan J . Casillas Ayala, Esq.
Alberto J.E. Aneses Negron, Esq.

Counsel for the Fee Examiner

Godfrey & Kahn S.C.
One East Main Street, Suite 500
Madison, Wisconsin 53703-3300
Attn: Katherine Stadler, Esq.

and

EDGE Legal Strategies, PSG
252 Ponce de Le6n
Avenue Citibank Tower,
12th Floor San Juan, PR
00918
Attn: Eyck O. Luge

U.S. Trustee

Office of the United States Trustee for the District of Puerto Rico
Edificio Ochoa
500 Tanca Street, Suite 301
San Juan, PR 00901 (re: *In re: Commonwealth of Puerto Rico*)

Counsel for the Official Committee of Retired Employees

Jenner & Block LLP
919 Third Ave.
New York, NY 10022
Attn: Robert Gordon, Esq.
Richard Levin, Esq.

and

Jenner & Block LLP
353 N. Clark Street
Chicago, IL 60654
Attn: Catherine Steege, Esq.
Melissa Root, Esq.

and

Bennazar, Garcia & Milian, C.S.P.
Edificio Union Plaza, PH-A,
416 Ave. Ponce de Leon
Hate Rey, PR 00918
Attn: A.J. Bennazar-Zequeira, Esq.

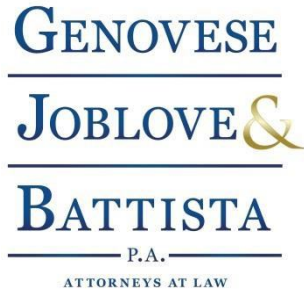
Puerto Rico Department of Treasury

Puerto Rico Department of
Treasury

PO Box 9024140

San Juan, PR 00902-4140

Attn: Reylam Guerra Goderich, Deputy Assistant of Central Accounting
Omar E. Rodriguez Perez, CPA, Assistant Secretary of Central Accounting
Angel L. Pantoja Rodriguez, Deputy Assistant Secretary of Internal Revenue and Tax
Policy
Francisco Pares Alicea, Assistant Secretary of Internal Revenue and Tax Policy
Francisco Pefia Montanez, CPA, Assistant Secretary of the Treasury



August 6, 2020

Via Electronic Mail

The Commonwealth of Puerto Rico
Puerto Rico Fiscal Agency and Financial Advisory Authority
c/o O'Melveny & Myers, LLP
Time Square Tower
7 Times Square
New York, NY 10036

Attn: John J. Rapisardi, Esq., Suzanne Uhland, Esq., Peter Friedman, Esq. and Diana M. Perez, Esq.

**Re: *In re Commonwealth of Puerto Rico, et al.* Case No. 17-BK-3283 (LTS)
(Jointly Administered) –
Genovese, Joblove & Battista, P.A. May 2020 Fee Statement**

Dear Mr. Rapisardi, Ms. Uhland, Mr. Friedman, and Ms. Perez:

By order entered May 31, 2019 (the “Retention Order”), the U.S. District Court for the District of Puerto Rico authorized the employment and retention of Genovese, Joblove & Battista, P.A. (“GJB”) as special litigation counsel to the Official Committee of Unsecured Creditors.

In accordance with the second interim compensation order, dated June 6, 2018 (the “Interim Compensation Order”) please find enclosed copies of GJB’s May 2020 Fee Statement (the “May Fee Statement”) for certain services rendered and expenses incurred during the period ending May 31, 2020.

In accordance with the Interim Compensation Order, I hereby certify that no public servant of the Department of Treasury and no employee of the Puerto Rico Highways and Transportation Authority, the Employees Retirement Systems of the Government of the Commonwealth of Puerto Rico, or the Puerto Rico Electric Power Authority is a party to or has any interest in the gains or benefits derived from the contract that is the basis of this invoice. The only consideration for providing services under the contract is the payment agreed upon with

the Committee.¹ The amount shown on the attached invoices is reasonable. The services were rendered and the corresponding payment has not been made. To the best of my knowledge, GJB does not have any debts owed to the Government of Puerto Rico or its instrumentalities.

Further, in accordance with the Interim Compensation Order, please see attached as ***Exhibit “A”*** the certification authorizing the submission of the February Fee Statement. Also attached hereto as ***Exhibit “B”*** is the related Declaration regarding fees and expenses related to the activities undertaken in Puerto Rico vs. outside of Puerto Rico.

A summary of the breakdown of fees and expenses in the May Fee Statement is provided below for your ease of reference.

1. Commonwealth of Puerto Rico 001 Matter

i. *Services rendered outside of Puerto Rico*

Matter	Matter Name	Invoice Number	Fees	20% Discount (\$15,032.50)	Fees Requested to be Paid (90%)	Expenses Requested to be Paid (100%)	Fees & Expenses Requested to be Paid
12272-001	Promesa Special Conflicts Counsel	98313	\$75,162.50	\$60,130.00	\$54,117.00	\$7,029.08	\$61,146.08

2. Puerto Rico Electric Power Authority (“PREPA”) 002 Matter

i. *Services rendered outside Puerto Rico*

Matter	Matter Name	Invoice Number	Fees	20% Discount (\$2,438.10)	Fees Requested to be Paid (90%)	Expenses Requested to be Paid (100%)	Fees & Expenses Requested to be Paid
12272-002	PREPA Adversary	98314	\$12,190.50	\$9,752.40	\$8,777.16	\$0.00	\$8,777.16

¹ For the avoidance of doubt, in accordance with the Retention Order, the Debtors are responsible for the compensation of GJB’s fees and reimbursement of its expenses, and under no circumstances are the Committee members responsible for payment of GJB’s fees and expenses.

3. Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS”) 003 Matter

i. *Services rendered outside Puerto Rico*

Matter	Matter Name	Invoice Number	Fees	20% Discount (\$906.50)	Fees Requested to be Paid (90%)	Expenses Requested to be Paid (100%)	Fees & Expenses Requested to be Paid
12272-003	ERS Litigation	98315	\$4,352.50	\$3,626.00	\$3,263.40	\$0.00	\$3,263.40

4. HTA Litigation- 004 Matter

i. *Services rendered outside Puerto Rico*

Matter	Matter Name	Invoice Number	Fees	20% Discount (\$196.20)	Fees Requested to be Paid (90%)	Expenses Requested to be Paid (100%)	Fees & Expenses Requested to be Paid
12272-004	HTA Litigation	98316	\$981.00	\$784.80	\$706.32	\$0.00	\$706.32

Under the Retention Order (¶2, page 2), GJB agreed to reduce its regular hourly rates by twenty (20%) percent. The attached invoices reflect the full amount billed by GJB for fees in the amount of \$92,866.50 plus costs of \$7,029.08 for a total of \$99,895.58. The travel times that appear on the invoice have been adjusted to fifty (50%) percent of the billing rate. The twenty (20%) percent discount applied to fees in May is equal to \$18,573.30. The costs are \$7,029.08. Accordingly, GJB seeks payment of \$66,863.88 in fees (90% of the total discounted fees) and \$7,029.08 in costs (100% of the costs) as detailed in the May Fee Statement for a total of \$73,892.96.

Any objections you may have to the May Fee Statement should be served on GJB and the other Notice Parties so as to be received on or before 4:00 pm (Atlantic Standard Time) on the 10th day (or the next business day if such day is not a business day) following service of the May Fee Statement, which is **August 17, 2020** (“Objection Deadline”). If no party serves an objection to the May Statement on GJB and the other Notice Parties attached hereto as ***Exhibit “C”*** so as to be received by the Objection Deadline, GJB respectfully requests payment of \$73,892.96 to the following account:

Wiring and ACH Instructions:

Beneficiary Bank : First Citizens Bank

ABA Number : 053100300

Swift Code : FCBTUS33 (optional)

Account Number: 9063688157

Account Name : Genovese Joblove & Battista, P.A. – Operating Account

Bank Telephone #: 305-447-5050
Bank Address: 3121 Commodore Plaza, Coconut Grove, Florida 33133

If an objection is timely served with respect to the May Fee Statement, GJB requests payment of 90% of the requested fees and 100% of the requested costs that are not subject to such Objection, in accordance with the Interim Compensation Order.

Please let me know if you have any questions regarding any of the foregoing.

Sincerely,

/s/ Mariaelena Gayo- Guitian

Mariaelena Gayo-Guitian, Esq.

Exhibit A

Certification

PRINCIPAL CERTIFICATION

I, Alvin Velazquez, on behalf of the Service Employees International Union, solely in its capacity as a member of the Official Committee of Unsecured Creditors of the Title III Debtors (other than COFINA) (the “Committee”) (and not in its individual capacity), hereby certify that the Committee has approved Genovese Joblove & Battista, P.A.’s May fee statement for certain services rendered and expenses incurred during the period ending May 30, 2020.

/s/ Alvin Velazquez

Name: Alvin Velazquez
Company: Service Employees International
Union
Dated: August 6, 2020

Exhibit B

Tax Declaration

DECLARATION

I, Ken Forrest, hereby declare, under penalty of perjury as follows:

1. I am of legal age, a resident of the United States and Chief Financial Officer of Genovese, Joblove & Battista, P.A., ("GJB" or "Service Provider") with offices in Florida located at 100 Southeast Second Street, 44th Floor, Miami, Florida 33131 ("Miami" or "Main Office"); 200 East Broward Boulevard, Suite 1110, Fort Lauderdale, Florida 33301 ("Ft. Lauderdale") and 100 N. Tampa Street, Suite 2600, Tampa, Florida ("Tampa"). GJB also has an affiliate office in Caracas Venezuela located at Av. Francisco de Miranda, Torre Provincial "A" piso 8 oficina 81 y 82 1060 Caracas, Venezuela.

2. The facts set forth in this declaration are based upon my personal knowledge and the firm's financial records that were reviewed by me or other GJB employees acting under my supervision and direction

3. I submit this declaration in support of the Monthly Fee Statement submitted for payment by GJB for the month of May 2020;

4. GJB is a professional association organized under the laws of the State of Florida in the United States with Employer ID 65-0518134. GJB is not engaged in any trade or business in Puerto Rico.

5. GJB's taxable year ends on December 31 (the "Tax Year").

6. GJB does not have an office or other fixed place of business within Puerto Rico, as described under Puerto Rico Treasury Regulation No. 6257.

7. The following fees and expenses relate to activities undertaken outside of Puerto Rico by the Service Provider as part of the PROMESA Title III proceedings during the fee period beginning on May 1, 2020 through May 31, 2020, which constitute gross income from sources outside Puerto Rico pursuant to the Puerto Rico Internal Revenue Code of 2011, as amended (the "Code");

1. **Commonwealth of Puerto Rico 001 Matter**

i. *Services rendered outside of Puerto Rico*

Matter	Matter Name	Invoice Number	Fees	20% Discount (\$15,032.50)	Fees Requested to be Paid (90%)	Expenses Requested to be Paid (100%)	Fees & Expenses Requested to be Paid
12272-001	Promesa Special Conflicts Counsel	98313	\$75,162.50	\$60,130.00	\$54,117.00	\$7,029.08	\$61,146.08

2. **Puerto Rico Electric Power Authority ("PREPA") 002 Matter**

i. *Services rendered outside Puerto Rico*

Matter	Matter Name	Invoice Number	Fees	20% Discount (\$2,438.10)	Fees Requested to be Paid (90%)	Expenses Requested to be Paid (100%)	Fees & Expenses Requested to be Paid
12272-002	PREPA Adversary	98314	\$12,190.50	\$9,752.40	\$8,777.16	\$0.00	\$8,777.16

3. **Employees Retirement System of the Government of the Commonwealth of Puerto Rico ("ERS") 003 Matter**

i. *Services rendered outside Puerto Rico*

Matter	Matter Name	Invoice Number	Fees	20% Discount (\$906.50)	Fees Requested to be Paid (90%)	Expenses Requested to be Paid (100%)	Fees & Expenses Requested to be Paid
12272-003	ERS Litigation	98315	\$4,352.50	\$3,626.00	\$ \$3,263.40	\$0.00	\$3,263.40

4. **HTA Litigation- 004 Matter**

i. *Services rendered outside Puerto Rico*

Matter	Matter Name	Invoice Number	Fees	20% Discount (\$196.20)	Fees Requested to be Paid (90%)	Expenses Requested to be Paid (100%)	Fees & Expenses Requested to be Paid
12272-004	HTA Litigation	98316	\$981.00	\$784.80	\$706.32	\$0.00	\$706.32

8. The invoices submitted in connection with the May Fee Statement and summarized above reflect the full amount billed by GJB for fees in the amount of \$92,866.50 plus costs of \$7,029.08 for a total of \$99,895.58.

9. That under the GJB's retention order in the Title III cases, GJB agreed to a voluntary 20% reduction in its hourly fees sought to be paid in the amount of \$18,573.30 (20% discount). The costs are \$7,029.08. Accordingly, GJB seeks payment of \$66,863.88 in fees (90% of the total discounted fees) and \$7,029.08 in costs (100% of the costs) as detailed in the May Fee Statement for a total of \$73,892.96.

IN WITNESS WHEREOF, I hereby declare, under penalty of perjury, that the above statement is true and correct on this 6th day of August 2020, in Miami, Florida.



KEN FORREST

Exhibit C

Notice Parties

Counsel for the Oversight Board

Proskauer Rose LLP
Eleven Times Square
New York, NY
10036
Attn: Martin J. Bienenstock, Esq.
Ehud Barak Esq. and

Proskauer Rose LLP,
70 West Madison
Street, Chicago, IL
60602
Attn: Paul V. Possinger, Esq.

and

O'Neill & Borges LLC
250 Mulioz Rivera Ave., Suite 800
San Juan, PR 00918
Attn: Hermann D. Bauer, Esq.

Counsel for the Puerto Rico Fiscal Agency and Financial Advisory Authority

Marini Pietrantonio Muniz
LLC MCS Plaza, Suite 500
255 Ponce de León Ave
San Juan, PR 00917
Attn: Luis C. Marini-Biaggi, Esq.
Carolina Velaz-Rivero Esq.

The Office of the United States Trustee for the District of Puerto Rico

Edificio Ochoa
500 Tanca Street, Suite 301
San Juan, Puerto Rico 00901 (re: In Commonwealth of Puerto Rico)

Counsel for the Official Committee of Unsecured Creditors

Paul Hastings
200 Park Avenue
New York, NY 10166
Attn: Luc A. Despina, Esq.

Counsel for the Official Committee of Unsecured Creditors

Casillas, Santiago & Torres, LLC
El Caribe office Building
53 Palmeras Street, Ste. 1601
San Juan, Puerto Rico 00901
Attn: Juan J . Casillas Ayala, Esq.
Alberto J.E. Aneses Negron, Esq.

Counsel for the Fee Examiner

Godfrey & Kahn S.C.
One East Main Street, Suite 500
Madison, Wisconsin 53703-3300
Attn: Katherine Stadler, Esq.

and

EDGE Legal Strategies, PSG
252 Ponce de Le6n
Avenue Citibank Tower,
12th Floor San Juan, PR
00918
Attn: Eyck O. Luge

U.S. Trustee

Office of the United States Trustee for the District of Puerto Rico
Edificio Ochoa
500 Tanca Street, Suite 301
San Juan, PR 00901 (re: *In re: Commonwealth of Puerto Rico*)

Counsel for the Official Committee of Retired Employees

Jenner & Block LLP
919 Third Ave.
New York, NY 10022
Attn: Robert Gordon, Esq.
Richard Levin, Esq.

and

Jenner & Block LLP
353 N. Clark Street
Chicago, IL 60654
Attn: Catherine Steege, Esq.
Melissa Root, Esq.

and

Bennazar, Garcia & Milian, C.S.P.
Edificio Union Plaza, PH-A,
416 Ave. Ponce de Leon
Hate Rey, PR 00918
Attn: A.J. Bennazar-Zequeira, Esq.

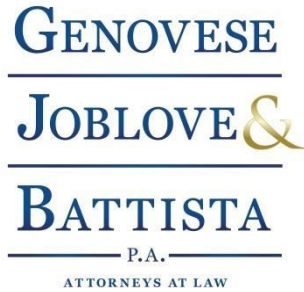
Puerto Rico Department of Treasury

Puerto Rico Department of
Treasury

PO Box 9024140

San Juan, PR 00902-4140

Attn: Reylam Guerra Goderich, Deputy Assistant of Central Accounting
Omar E. Rodriguez Perez, CPA, Assistant Secretary of Central Accounting
Angel L. Pantoja Rodriguez, Deputy Assistant Secretary of Internal Revenue and Tax
Policy
Francisco Pares Alicea, Assistant Secretary of Internal Revenue and Tax Policy
Francisco Pefia Montanez, CPA, Assistant Secretary of the Treasury



August 19, 2020

Via Electronic Mail

The Commonwealth of Puerto Rico
Puerto Rico Fiscal Agency and Financial Advisory Authority
c/o O'Melveny & Myers, LLP
Time Square Tower
7 Times Square
New York, NY 10036

Attn: John J. Rapisardi, Esq., Suzzanne Uhland, Esq., Peter Friedman, Esq. and Diana M. Perez, Esq.

**Re: *In re Commonwealth of Puerto Rico, et al.* Case No. 17-BK-3283 (LTS)
(Jointly Administered) –
Genovese, Joblove & Battista, P.A. June 2020 Fee Statement**

Dear Mr. Rapisardi, Ms. Uhland, Mr. Friedman, and Ms. Perez:

By order entered May 31, 2019 (the “Retention Order”), the U.S. District Court for the District of Puerto Rico authorized the employment and retention of Genovese, Joblove & Battista, P.A. (“GJB”) as special litigation counsel to the Official Committee of Unsecured Creditors.

In accordance with the second interim compensation order, dated June 6, 2018 (the “Interim Compensation Order”) please find enclosed copies of GJB’s June 2020 Fee Statement (the “June Fee Statement”) for certain services rendered and expenses incurred during the period ending June 30 2020.

In accordance with the Interim Compensation Order, I hereby certify that no public servant of the Department of Treasury and no employee of the Puerto Rico Highways and Transportation Authority, the Employees Retirement Systems of the Government of the Commonwealth of Puerto Rico, or the Puerto Rico Electric Power Authority is a party to or has any interest in the gains or benefits derived from the contract that is the basis of this invoice. The only consideration for providing services under the contract is the payment agreed upon with

the Committee.¹ The amount shown on the attached invoices is reasonable. The services were rendered and the corresponding payment has not been made. To the best of my knowledge, GJB does not have any debts owed to the Government of Puerto Rico or its instrumentalities.

Further, in accordance with the Interim Compensation Order, please see attached as ***Exhibit “A”*** the certification authorizing the submission of the February Fee Statement. Also attached hereto as ***Exhibit “B”*** is the related Declaration regarding fees and expenses related to the activities undertaken in Puerto Rico vs. outside of Puerto Rico.

A summary of the breakdown of fees and expenses in the June Fee Statement is provided below for your ease of reference.

1. Commonwealth of Puerto Rico 001 Matter

i. *Services rendered outside of Puerto Rico*

Matter	Matter Name	Invoice Number	Fees	20% Discount (\$11,417.80)	Fees Requested to be Paid (90%)	Expenses Requested to be Paid (100%)	Fees & Expenses Requested to be Paid
12272-001	Promesa Special Conflicts Counsel	98609	\$57,089.00	\$45,671.20	\$41,104.08	\$15,434.36	\$56,538.44

2. Puerto Rico Electric Power Authority (“PREPA”) 002 Matter

i. *Services rendered outside Puerto Rico*

Matter	Matter Name	Invoice Number	Fees	20% Discount (\$1,323.70)	Fees Requested to be Paid (90%)	Expenses Requested to be Paid (100%)	Fees & Expenses Requested to be Paid
12272-002	PREPA Adversary	98602	\$6,618.50	\$5,294.80	\$4,765.32	\$55.20	\$4,820.52

¹ For the avoidance of doubt, in accordance with the Retention Order, the Debtors are responsible for the compensation of GJB’s fees and reimbursement of its expenses, and under no circumstances are the Committee members responsible for payment of GJB’s fees and expenses.

3. Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS”) 003 Matter

i. *Services rendered outside Puerto Rico*

Matter	Matter Name	Invoice Number	Fees	20% Discount (\$1,172.50)	Fees Requested to be Paid (90%)	Expenses Requested to be Paid (100%)	Fees & Expenses Requested to be Paid
12272-003	ERS Litigation	98603	\$5,862.50	\$4,690.00	\$4,221.00	\$0.00	\$4,221.00

4. HTA Litigation- 004 Matter

i. *Services rendered outside Puerto Rico*

Matter	Matter Name	Invoice Number	Fees	20% Discount (\$11.70)	Fees Requested to be Paid (90%)	Expenses Requested to be Paid (100%)	Fees & Expenses Requested to be Paid
12272-004	HTA Litigation	98604	\$58.50	\$46.80	\$42.12	\$0.00	\$42.12

Under the Retention Order (¶2, page 2), GJB agreed to reduce its regular hourly rates by twenty (20%) percent. The attached invoices reflect the full amount billed by GJB for fees in the amount of \$69,628.50 plus costs of \$15,489.56 for a total of \$85,118.06. The travel times that appear on the invoice have been adjusted to fifty (50%) percent of the billing rate. The twenty (20%) percent discount applied to fees in June is equal to \$13,925.70. The costs are \$15,489.56. Accordingly, GJB seeks payment of \$50,132.52 in fees (90% of the total discounted fees) and \$715,489.56 in costs (100% of the costs) as detailed in the June Fee Statement for a total of \$65,622.08.

Any objections you June have to the June Fee Statement should be served on GJB and the other Notice Parties so as to be received on or before 4:00 pm (Atlantic Standard Time) on the 10th day (or the next business day if such day is not a business day) following service of the June Fee Statement, which is **August 31, 2020** (“Objection Deadline”). If no party serves an objection to the June Statement on GJB and the other Notice Parties attached hereto as ***Exhibit “C”*** so as to be received by the Objection Deadline, GJB respectfully requests payment of \$65,622.08 to the following account:

Wiring and ACH Instructions:

Beneficiary Bank : First Citizens Bank

ABA Number : 053100300

Swift Code : FCBTUS33 (optional)

Account Number: 9063688157

Account Name : Genovese Joblove & Battista, P.A. – Operating Account

Bank Telephone #: 305-447-5050
Bank Address: 3121 Commodore Plaza, Coconut Grove, Florida 33133

If an objection is timely served with respect to the June Fee Statement, GJB requests payment of 90% of the requested fees and 100% of the requested costs that are not subject to such Objection, in accordance with the Interim Compensation Order.

Please let me know if you have any questions regarding any of the foregoing.

Sincerely,

/s/ Mariaelena Gayo- Guitian

Mariaelena Gayo-Guitian, Esq.

Exhibit A

Certification

PRINCIPAL CERTIFICATION

I, Alvin Velazquez, on behalf of the Service Employees International Union, solely in its capacity as a member of the Official Committee of Unsecured Creditors of the Title III Debtors (other than COFINA) (the “Committee”) (and not in its individual capacity), hereby certify that the Committee has approved Genovese Joblove & Battista, P.A.’s June fee statement for certain services rendered and expenses incurred during the period ending June 30, 2020.

/s/ Alvin Velazquez

Name: Alvin Velazquez
Company: Service Employees International
Union
Dated: August 19, 2020

Exhibit B

Tax Declaration

DECLARATION

I, Ken Forrest, hereby declare, under penalty of perjury as follows:

1. I am of legal age, a resident of the United States and Chief Financial Officer of Genovese, Joblove & Battista, P.A., ("GJB" or "Service Provider") with offices in Florida located at 100 Southeast Second Street, 44th Floor, Miami, Florida 33131 ("Miami" or "Main Office"); 200 East Broward Boulevard, Suite 1110, Fort Lauderdale, Florida 33301 ("Ft. Lauderdale") and 100 N. Tampa Street, Suite 2600, Tampa, Florida ("Tampa"). GJB also has an affiliate office in Caracas Venezuela located at Av. Francisco de Miranda, Torre Provincial "A" piso 8 oficina 81 y 82 1060 Caracas, Venezuela.

2. The facts set forth in this declaration are based upon my personal knowledge and the firm's financial records that were reviewed by me or other GJB employees acting under my supervision and direction

3. I submit this declaration in support of the Monthly Fee Statement submitted for payment by GJB for the month of June 2020;

4. GJB is a professional association organized under the laws of the State of Florida in the United States with Employer ID 65-0518134. GJB is not engaged in any trade or business in Puerto Rico.

5. GJB's taxable year ends on December 31 (the "Tax Year").

6. GJB does not have an office or other fixed place of business within Puerto Rico, as described under Puerto Rico Treasury Regulation No. 6257.

7. The following fees and expenses relate to activities undertaken outside of Puerto Rico by the Service Provider as part of the PROMESA Title III proceedings during the fee period beginning on June 1, 2020 through June 30, 2020, which constitute gross income from sources outside Puerto Rico pursuant to the Puerto Rico Internal Revenue Code of 2011, as amended (the "Code");

1. Commonwealth of Puerto Rico 001 Matter

i. *Services rendered outside of Puerto Rico*

Matter	Matter Name	Invoice Number	Fees	20% Discount (\$11,417.80)	Fees Requested to be Paid (90%)	Expenses Requested to be Paid (100%)	Fees & Expenses Requested to be Paid
12272-001	Promesa Special Conflicts Counsel	98609	\$57,089.00	\$45,671.20	\$41,104.08	\$15,434.36	\$56,538.44

2. Puerto Rico Electric Power Authority ("PREPA") 002 Matter

i. *Services rendered outside Puerto Rico*

Matter	Matter Name	Invoice Number	Fees	20% Discount (\$1,323.70)	Fees Requested to be Paid (90%)	Expenses Requested to be Paid (100%)	Fees & Expenses Requested to be Paid
12272-002	PREPA Adversary	98602	\$6,618.50	\$5,294.80	\$4,765.32	\$55.20	\$4,820.52

3. Employees Retirement System of the Government of the Commonwealth of Puerto Rico ("ERS") 003 Matter

i. *Services rendered outside Puerto Rico*

Matter	Matter Name	Invoice Number	Fees	20% Discount (\$1,172.50)	Fees Requested to be Paid (90%)	Expenses Requested to be Paid (100%)	Fees & Expenses Requested to be Paid
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4. HTA Litigation- 004 Matter

i. *Services rendered outside Puerto Rico*

Matter	Matter Name	Invoice Number	Fees	20% Discount (\$11.70)	Fees Requested to be Paid (90%)	Expenses Requested to be Paid (100%)	Fees & Expenses Requested to be Paid
12272-004	HTA Litigation	98604	\$58.50	\$46.80	\$42.12	\$0.00	\$42.12

8. The invoices submitted in connection with the June Fee Statement and summarized above reflect the full amount billed by GJB for fees in the amount of \$69,628.50 plus costs of \$15,489.56 for a total of \$85,118.06.

9. That under the GJB's retention order in the Title III cases, GJB agreed to a voluntary 20% reduction in its hourly fees sought to be paid in the amount of \$13,925.70 (20% discount). The costs are \$15,489.56. Accordingly, GJB seeks payment of \$50,132.52 in fees (90% of the total discounted fees) and \$15,489.56 in costs (100% of the costs) as detailed in the June Fee Statement for a total of \$65,622.08.

IN WITNESS WHEREOF, I hereby declare, under penalty of perjury, that the above statement is true and correct on this 19th day of August 2020, in Miami, Florida.

A handwritten signature in blue ink, appearing to read 'Ken Forrest', is written over a horizontal line.

KEN FORREST

Exhibit C

Notice Parties

Counsel for the Oversight Board

Proskauer Rose LLP
Eleven Times Square
New York, NY
10036
Attn: Martin J. Bienenstock, Esq.
Ehud Barak Esq. and

Proskauer Rose LLP,
70 West Madison
Street, Chicago, IL
60602
Attn: Paul V. Possinger, Esq.

and

O'Neill & Borges LLC
250 Mulioz Rivera Ave., Suite 800
San Juan, PR 00918
Attn: Hermann D. Bauer, Esq.

Counsel for the Puerto Rico Fiscal Agency and Financial Advisory Authority

Marini Pietrantonio Muniz
LLC MCS Plaza, Suite 500
255 Ponce de León Ave
San Juan, PR 00917
Attn: Luis C. Marini-Biaggi, Esq.
Carolina Velaz-Rivero Esq.

The Office of the United States Trustee for the District of Puerto Rico

Edificio Ochoa
500 Tanca Street, Suite 301
San Juan, Puerto Rico 00901 (re: In Commonwealth of Puerto Rico)

Counsel for the Official Committee of Unsecured Creditors

Paul Hastings
200 Park Avenue
New York, NY 10166
Attn: Luc A. Despina, Esq.

Counsel for the Official Committee of Unsecured Creditors

Casillas, Santiago & Torres, LLC
El Caribe office Building
53 Palmeras Street, Ste. 1601
San Juan, Puerto Rico 00901
Attn: Juan J . Casillas Ayala, Esq.
Alberto J.E. Aneses Negron, Esq.

Counsel for the Fee Examiner

Godfrey & Kahn S.C.
One East Main Street, Suite 500
Madison, Wisconsin 53703-3300
Attn: Katherine Stadler, Esq.

and

EDGE Legal Strategies, PSG
252 Ponce de Le6n
Avenue Citibank Tower,
12th Floor San Juan, PR
00918
Attn: Eyck O. Luge

U.S. Trustee

Office of the United States Trustee for the District of Puerto Rico
Edificio Ochoa
500 Tanca Street, Suite 301
San Juan, PR 00901 (re: *In re: Commonwealth of Puerto Rico*)

Counsel for the Official Committee of Retired Employees

Jenner & Block LLP
919 Third Ave.
New York, NY 10022
Attn: Robert Gordon, Esq.
Richard Levin, Esq.

and

Jenner & Block LLP
353 N. Clark Street
Chicago, IL 60654
Attn: Catherine Steege, Esq.
Melissa Root, Esq.

and

Bennazar, Garcia & Milian, C.S.P.
Edificio Union Plaza, PH-A,
416 Ave. Ponce de Leon
Hate Rey, PR 00918
Attn: A.J. Bennazar-Zequiera, Esq.

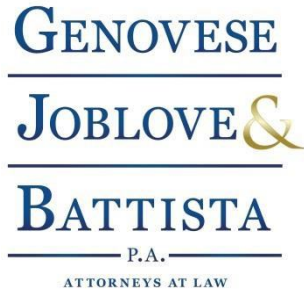
Puerto Rico Department of Treasury

Puerto Rico Department of
Treasury

PO Box 9024140

San Juan, PR 00902-4140

Attn: Reylam Guerra Goderich, Deputy Assistant of Central Accounting
Omar E. Rodriguez Perez, CPA, Assistant Secretary of Central Accounting
Angel L. Pantoja Rodriguez, Deputy Assistant Secretary of Internal Revenue and Tax
Policy
Francisco Pares Alicea, Assistant Secretary of Internal Revenue and Tax Policy
Francisco Pefia Montanez, CPA, Assistant Secretary of the Treasury



September 17, 2020

Via Electronic Mail

The Commonwealth of Puerto Rico
Puerto Rico Fiscal Agency and Financial Advisory Authority
c/o O'Melveny & Myers, LLP
Time Square Tower
7 Times Square
New York, NY 10036

Attn: John J. Rapisardi, Esq., Suzanne Uhland, Esq., Peter Friedman, Esq. and Diana M. Perez, Esq.

**Re: *In re Commonwealth of Puerto Rico, et al.* Case No. 17-BK-3283 (LTS)
(Jointly Administered) –
Genovese, Joblove & Battista, P.A. July 2020 Fee Statement**

Dear Mr. Rapisardi, Ms. Uhland, Mr. Friedman, and Ms. Perez:

By order entered May 31, 2019 (the “Retention Order”), the U.S. District Court for the District of Puerto Rico authorized the employment and retention of Genovese, Joblove & Battista, P.A. (“GJB”) as special litigation counsel to the Official Committee of Unsecured Creditors.

In accordance with the second interim compensation order, dated June 6, 2018 (the “Interim Compensation Order”) please find enclosed copies of GJB’s July 2020 Fee Statement (the “July Fee Statement”) for certain services rendered and expenses incurred during the period ending July 31, 2020.

In accordance with the Interim Compensation Order, I hereby certify that no public servant of the Department of Treasury and no employee of the Puerto Rico Highways and Transportation Authority, the Employees Retirement Systems of the Government of the Commonwealth of Puerto Rico, or the Puerto Rico Electric Power Authority is a party to or has any interest in the gains or benefits derived from the contract that is the basis of this invoice. The only consideration for providing services under the contract is the payment agreed upon with

the Committee.¹ The amount shown on the attached invoices is reasonable. The services were rendered and the corresponding payment has not been made. To the best of my knowledge, GJB does not have any debts owed to the Government of Puerto Rico or its instrumentalities.

Further, in accordance with the Interim Compensation Order, please see attached as ***Exhibit “A”*** the certification authorizing the submission of the July Fee Statement. Also attached hereto as ***Exhibit “B”*** is the related Declaration regarding fees and expenses related to the activities undertaken in Puerto Rico vs. outside of Puerto Rico.

A summary of the breakdown of fees and expenses in the July Fee Statement is provided below for your ease of reference.

1. Commonwealth of Puerto Rico 001 Matter

i. *Services rendered outside of Puerto Rico*

Matter	Matter Name	Invoice Number	Fees	20% Discount (\$18,460.90)	Fees Requested to be Paid (90%)	Expenses Requested to be Paid (100%)	Fees & Expenses Requested to be Paid
12272-001	Promesa Special Conflicts Counsel	98924	\$92,304.50	\$73,843.60	\$66,459.24	\$7,384.90	\$73,844.14

2. Puerto Rico Electric Power Authority (“PREPA”) 002 Matter

i. *Services rendered outside Puerto Rico*

Matter	Matter Name	Invoice Number	Fees	20% Discount (\$2,114.20)	Fees Requested to be Paid (90%)	Expenses Requested to be Paid (100%)	Fees & Expenses Requested to be Paid
12272-002	PREPA Adversary	98853	\$10,571.00	\$8,456.80	\$7,611.12	\$0.00	\$7,611.12

¹ For the avoidance of doubt, in accordance with the Retention Order, the Debtors are responsible for the compensation of GJB’s fees and reimbursement of its expenses, and under no circumstances are the Committee members responsible for payment of GJB’s fees and expenses.

3. Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS”) 003 Matter

i. *Services rendered outside Puerto Rico*

Matter	Matter Name	Invoice Number	Fees	20% Discount (\$871.70)	Fees Requested to be Paid (90%)	Expenses Requested to be Paid (100%)	Fees & Expenses Requested to be Paid
12272-003	ERS Litigation	98854	\$4,358.50	\$3,486.80	\$3,138.12	\$0.00	\$3,138.12

4. HTA Litigation- 004 Matter

i. *Services rendered outside Puerto Rico*

Matter	Matter Name	Invoice Number	Fees	20% Discount (\$144.30)	Fees Requested to be Paid (90%)	Expenses Requested to be Paid (100%)	Fees & Expenses Requested to be Paid
12272-004	HTA Litigation	98855	\$721.50	\$577.20	\$519.48	\$0.00	\$519.48

Under the Retention Order (¶2, page 2), GJB agreed to reduce its regular hourly rates by twenty (20%) percent. The attached invoices reflect the full amount billed by GJB for fees in the amount of \$107,955.50 plus costs of \$7,384.90 for a total of \$115,340.40. The travel times that appear on the invoice have been adjusted to fifty (50%) percent of the billing rate. The twenty (20%) percent discount applied to fees in July is equal to \$21,591.10. The costs are \$7,384.90. Accordingly, GJB seeks payment of \$77,727.96 in fees (90% of the total discounted fees) and \$7,384.90 in costs (100% of the costs) as detailed in the July Fee Statement for a total of \$85,112.86.

Any objections you may have to the July Fee Statement should be served on GJB and the other Notice Parties so as to be received on or before 4:00 pm (Atlantic Standard Time) on the 10th day (or the next business day if such day is not a business day) following service of the July Fee Statement, which is **September 28, 2020** (“Objection Deadline”). If no party serves an objection to the July Statement on GJB and the other Notice Parties attached hereto as ***Exhibit “C”*** so as to be received by the Objection Deadline, GJB respectfully requests payment of \$85,112.86 to the following account:

Wiring and ACH Instructions:

Beneficiary Bank : First Citizens Bank

ABA Number : 053100300

Swift Code : FCBTUS33 (optional)

Account Number: 9063688157

Account Name : Genovese Joblove & Battista, P.A. – Operating Account

Bank Telephone #: 305-447-5050
Bank Address: 3121 Commodore Plaza, Coconut Grove, Florida 33133

If an objection is timely served with respect to the July Fee Statement, GJB requests payment of 90% of the requested fees and 100% of the requested costs that are not subject to such Objection, in accordance with the Interim Compensation Order.

Please let me know if you have any questions regarding any of the foregoing.

Sincerely,

/s/ Mariaelena Gayo- Guitian

Mariaelena Gayo-Guitian, Esq.

Exhibit A

Certification

PRINCIPAL CERTIFICATION

I, Alvin Velazquez, on behalf of the Service Employees International Union, solely in its capacity as a member of the Official Committee of Unsecured Creditors of the Title III Debtors (other than COFINA) (the “Committee”) (and not in its individual capacity), hereby certify that the Committee has approved Genovese Joblove & Battista, P.A.’s July fee statement for certain services rendered and expenses incurred during the period ending July 31, 2020.

/s/ Alvin Velazquez

Name: Alvin Velazquez
Company: Service Employees International Union
Dated: September 14, 2020

Exhibit B

Tax Declaration

DECLARATION

I, Ken Forrest, hereby declare, under penalty of perjury as follows:

1. I am of legal age, a resident of the United States and Chief Financial Officer of Genovese, Joblove & Battista, P.A., ("GJB" or "Service Provider") with offices in Florida located at 100 Southeast Second Street, 44th Floor, Miami, Florida 33131 ("Miami" or "Main Office"); 200 East Broward Boulevard, Suite 1110, Fort Lauderdale, Florida 33301 ("Ft. Lauderdale") and 100 N. Tampa Street, Suite 2600, Tampa, Florida ("Tampa"). GJB also has an affiliate office in Caracas Venezuela located at Av. Francisco de Miranda, Torre Provincial "A" piso 8 oficina 81 y 82 1060 Caracas, Venezuela.

2. The facts set forth in this declaration are based upon my personal knowledge and the firm's financial records that were reviewed by me or other GJB employees acting under my supervision and direction

3. I submit this declaration in support of the Monthly Fee Statement submitted for payment by GJB for the month of July 2020;

4. GJB is a professional association organized under the laws of the State of Florida in the United States with Employer ID 65-0518134. GJB is not engaged in any trade or business in Puerto Rico.

5. GJB's taxable year ends on December 31 (the "Tax Year").

6. GJB does not have an office or other fixed place of business within Puerto Rico, as described under Puerto Rico Treasury Regulation No. 6257.

7. The following fees and expenses relate to activities undertaken outside of Puerto Rico by the Service Provider as part of the PROMESA Title III proceedings during the fee period beginning on July 1, 2020 through July 31, 2020, which constitute gross income from sources outside Puerto Rico pursuant to the Puerto Rico Internal Revenue Code of 2011, as amended (the "Code");

1. **Commonwealth of Puerto Rico 001 Matter**

i. *Services rendered outside of Puerto Rico*

Matter	Matter Name	Invoice Number	Fees	20% Discount (\$18,460.90)	Fees Requested to be Paid (90%)	Expenses Requested to be Paid (100%)	Fees & Expenses Requested to be Paid
12272-001	Promesa Special Conflicts Counsel	98924	\$92,304.50	\$73,843.60	\$66,459.24	\$7,384.90	\$73,844.14

2. **Puerto Rico Electric Power Authority ("PREPA") 002 Matter**

i. *Services rendered outside Puerto Rico*

Matter	Matter Name	Invoice Number	Fees	20% Discount (\$2,114.20)	Fees Requested to be Paid (90%)	Expenses Requested to be Paid (100%)	Fees & Expenses Requested to be Paid
12272-002	PREPA Adversary	98853	\$10,571.00	\$8,456.80	\$7,611.12	\$0.00	\$7,611.12

3. **Employees Retirement System of the Government of the Commonwealth of Puerto Rico ("ERS") 003 Matter**

i. *Services rendered outside Puerto Rico*

Matter	Matter Name	Invoice Number	Fees	20% Discount (\$871.70)	Fees Requested to be Paid (90%)	Expenses Requested to be Paid (100%)	Fees & Expenses Requested to be Paid
12272-003	ERS Litigation	98854	\$4,358.50	\$3,486.80	\$3,138.12	\$0.00	\$3,138.12

4. **HTA Litigation- 004 Matter**

i. *Services rendered outside Puerto Rico*

Matter	Matter Name	Invoice Number	Fees	20% Discount (\$144.30)	Fees Requested to be Paid (90%)	Expenses Requested to be Paid (100%)	Fees & Expenses Requested to be Paid
12272-004	HTA Litigation	98855	\$721.50	\$577.20	\$519.48	\$0.00	\$519.48

8. The invoices submitted in connection with the July Fee Statement and summarized above reflect the full amount billed by GJB for fees in the amount of \$107,955.50 plus costs of \$7,384.90 for a total of \$115,340.40.

9. That under the GJB's retention order in the Title III cases, GJB agreed to a voluntary 20% reduction in its hourly fees sought to be paid in the amount of \$21,591.10 (20% discount). The costs are \$7,384.90. Accordingly, GJB seeks payment of \$77,727.96 in fees (90% of the total discounted fees) and \$7,384.90 in costs (100% of the costs) as detailed in the July Fee Statement for a total of \$85,112.86.

IN WITNESS WHEREOF, I hereby declare, under penalty of perjury, that the above statement is true and correct on this 14th day of September 2020, in Miami, Florida.



KEN FORREST

Exhibit C

Notice Parties

Counsel for the Oversight Board

Proskauer Rose LLP
Eleven Times Square
New York, NY
10036
Attn: Martin J. Bienenstock, Esq.
Ehud Barak Esq. and

Proskauer Rose LLP,
70 West Madison
Street, Chicago, IL
60602
Attn: Paul V. Possinger, Esq.

and

O'Neill & Borges LLC
250 Mulioz Rivera Ave., Suite 800
San Juan, PR 00918
Attn: Hermann D. Bauer, Esq.

Counsel for the Puerto Rico Fiscal Agency and Financial Advisory Authority

Marini Pietrantonio Muniz
LLC MCS Plaza, Suite 500
255 Ponce de León Ave
San Juan, PR 00917
Attn: Luis C. Marini-Biaggi, Esq.
Carolina Velaz-Rivero Esq.

The Office of the United States Trustee for the District of Puerto Rico

Edificio Ochoa
500 Tanca Street, Suite 301
San Juan, Puerto Rico 00901 (re: In Commonwealth of Puerto Rico)

Counsel for the Official Committee of Unsecured Creditors

Paul Hastings
200 Park Avenue
New York, NY 10166
Attn: Luc A. Despina, Esq.

Counsel for the Official Committee of Unsecured Creditors

Casillas, Santiago & Torres, LLC
El Caribe office Building
53 Palmeras Street, Ste. 1601
San Juan, Puerto Rico 00901
Attn: Juan J . Casillas Ayala, Esq.
Alberto J.E. Aneses Negron, Esq.

Counsel for the Fee Examiner

Godfrey & Kahn S.C.
One East Main Street, Suite 500
Madison, Wisconsin 53703-3300
Attn: Katherine Stadler, Esq.

and

EDGE Legal Strategies, PSG
252 Ponce de Le6n
Avenue Citibank Tower,
12th Floor San Juan, PR
00918
Attn: Eyck O. Luge

U.S. Trustee

Office of the United States Trustee for the District of Puerto Rico
Edificio Ochoa
500 Tanca Street, Suite 301
San Juan, PR 00901 (re: *In re: Commonwealth of Puerto Rico*)

Counsel for the Official Committee of Retired Employees

Jenner & Block LLP
919 Third Ave.
New York, NY 10022
Attn: Robert Gordon, Esq.
Richard Levin, Esq.

and

Jenner & Block LLP
353 N. Clark Street
Chicago, IL 60654
Attn: Catherine Steege, Esq.
Melissa Root, Esq.

and

Bennazar, Garcia & Milian, C.S.P.
Edificio Union Plaza, PH-A,
416 Ave. Ponce de Leon
Hate Rey, PR 00918
Attn: A.J. Bennazar-Zequiera, Esq.

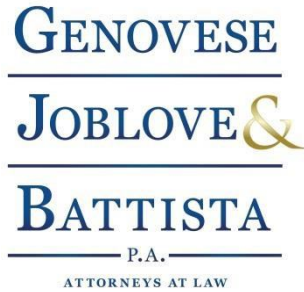
Puerto Rico Department of Treasury

Puerto Rico Department of
Treasury

PO Box 9024140

San Juan, PR 00902-4140

Attn: Reylam Guerra Goderich, Deputy Assistant of Central Accounting
Omar E. Rodriguez Perez, CPA, Assistant Secretary of Central Accounting
Angel L. Pantoja Rodriguez, Deputy Assistant Secretary of Internal Revenue and Tax
Policy
Francisco Pares Alicea, Assistant Secretary of Internal Revenue and Tax Policy
Francisco Pefia Montanez, CPA, Assistant Secretary of the Treasury



November 12, 2020

Via Electronic Mail

The Commonwealth of Puerto Rico
Puerto Rico Fiscal Agency and Financial Advisory Authority
c/o O'Melveny & Myers, LLP
Time Square Tower
7 Times Square
New York, NY 10036

Attn: John J. Rapisardi, Esq., Suzanne Uhland, Esq., Peter Friedman, Esq. and Diana M. Perez, Esq.

**Re: *In re Commonwealth of Puerto Rico, et al.* Case No. 17-BK-3283 (LTS)
(Jointly Administered) –
Genovese, Joblove & Battista, P.A. August 2020 Fee Statement**

Dear Mr. Rapisardi, Ms. Uhland, Mr. Friedman, and Ms. Perez:

By order entered May 31, 2019 (the “Retention Order”), the U.S. District Court for the District of Puerto Rico authorized the employment and retention of Genovese, Joblove & Battista, P.A. (“GJB”) as special litigation counsel to the Official Committee of Unsecured Creditors.

In accordance with the second interim compensation order, dated June 6, 2018 (the “Interim Compensation Order”) please find enclosed copies of GJB’s August 2020 Fee Statement (the “August Fee Statement”) for certain services rendered and expenses incurred during the period ending August 31, 2020.

In accordance with the Interim Compensation Order, I hereby certify that no public servant of the Department of Treasury and no employee of the Puerto Rico Highways and Transportation Authority, the Employees Retirement Systems of the Government of the Commonwealth of Puerto Rico, or the Puerto Rico Electric Power Authority is a party to or has any interest in the gains or benefits derived from the contract that is the basis of this invoice. The only consideration for providing services under the contract is the payment agreed upon with

the Committee.¹ The amount shown on the attached invoices is reasonable. The services were rendered and the corresponding payment has not been made. To the best of my knowledge, GJB does not have any debts owed to the Government of Puerto Rico or its instrumentalities.

Further, in accordance with the Interim Compensation Order, please see attached as ***Exhibit “A”*** the certification authorizing the submission of the August Fee Statement. Also attached hereto as ***Exhibit “B”*** is the related Declaration regarding fees and expenses related to the activities undertaken in Puerto Rico vs. outside of Puerto Rico.

A summary of the breakdown of fees and expenses in the August Fee Statement is provided below for your ease of reference.

1. Commonwealth of Puerto Rico 001 Matter

i. *Services rendered outside of Puerto Rico*

Matter	Matter Name	Invoice Number	Fees	20% Discount (\$18,520.70)	Fees Requested to be Paid (90%)	Expenses Requested to be Paid (100%)	Fees & Expenses Requested to be Paid
12272-001	Promesa Special Conflicts Counsel	99158	\$92,603.50	\$74,082.80	\$66,674.52	\$7,093.72	\$73,768.24

2. Puerto Rico Electric Power Authority (“PREPA”) 002 Matter

i. *Services rendered outside Puerto Rico*

Matter	Matter Name	Invoice Number	Fees	20% Discount (\$4,136.90)	Fees Requested to be Paid (90%)	Expenses Requested to be Paid (100%)	Fees & Expenses Requested to be Paid
12272-002	PREPA Adversary	99159	\$20,684.50	\$16,547.60	\$14,892.84	\$0.00	\$14,892.84

¹ For the avoidance of doubt, in accordance with the Retention Order, the Debtors are responsible for the compensation of GJB’s fees and reimbursement of its expenses, and under no circumstances are the Committee members responsible for payment of GJB’s fees and expenses.

3. Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS”) 003 Matter

i. *Services rendered outside Puerto Rico*

Matter	Matter Name	Invoice Number	Fees	20% Discount (\$460.00)	Fees Requested to be Paid (90%)	Expenses Requested to be Paid (100%)	Fees & Expenses Requested to be Paid
12272-003	ERS Litigation	99160	\$2,300.00	\$1,840.00	\$1,656.00	\$0.00	\$1,656.00

4. HTA Litigation- 004 Matter

i. *Services rendered outside Puerto Rico*

Matter	Matter Name	Invoice Number	Fees	20% Discount (\$87.90)	Fees Requested to be Paid (90%)	Expenses Requested to be Paid (100%)	Fees & Expenses Requested to be Paid
12272-004	HTA Litigation	99161	\$439.50	\$351.60	\$316.44	\$0.00	\$316.44

Under the Retention Order (¶2, page 2), GJB agreed to reduce its regular hourly rates by twenty (20%) percent. The attached invoices reflect the full amount billed by GJB for fees in the amount of \$116,027.50 plus costs of \$7,093.72 for a total of \$123,121.22. The travel times that appear on the invoice have been adjusted to fifty (50%) percent of the billing rate. The twenty (20%) percent discount applied to fees in August is equal to \$23,205.50. The costs are \$7,093.72. Accordingly, GJB seeks payment of \$83,539.80 in fees (90% of the total discounted fees) and \$7,093.72 in costs (100% of the costs) as detailed in the August Fee Statement for a total of \$90,633.52.

Any objections you may have to the August Fee Statement should be served on GJB and the other Notice Parties so as to be received on or before 4:00 pm (Atlantic Standard Time) on the 10th day (or the next business day if such day is not a business day) following service of the August Fee Statement, which is **November 23, 2020** (“Objection Deadline”). If no party serves an objection to the August Statement on GJB and the other Notice Parties attached hereto as ***Exhibit “C”*** so as to be received by the Objection Deadline, GJB respectfully requests payment of \$90,633.52 to the following account:

Wiring and ACH Instructions:

Beneficiary Bank : First Citizens Bank

ABA Number : 053100300

Swift Code : FCBTUS33 (optional)

Account Number: 9063688157

Account Name : Genovese Joblove & Battista, P.A. – Operating Account

Bank Telephone #: 305-447-5050

Bank Address: 3121 Commodore Plaza, Coconut Grove, Florida 33133

If an objection is timely served with respect to the August Fee Statement, GJB requests payment of 90% of the requested fees and 100% of the requested costs that are not subject to such Objection, in accordance with the Interim Compensation Order.

Please let me know if you have any questions regarding any of the foregoing.

Sincerely,

/s/ Mariaelena Gayo- Guitian

Mariaelena Gayo-Guitian, Esq.

Exhibit A

Certification

PRINCIPAL CERTIFICATION

I, Alvin Velazquez, on behalf of the Service Employees International Union, solely in its capacity as a member of the Official Committee of Unsecured Creditors of the Title III Debtors (other than COFINA) (the “Committee”) (and not in its individual capacity), hereby certify that the Committee has approved Genovese Joblove & Battista, P.A.’s August fee statement for certain services rendered and expenses incurred during the period ending August 31, 2020.

/s/ Alvin Velazquez

Name: Alvin Velazquez
Company: Service Employees International Union
Dated: October 20, 2020

Exhibit B

Tax Declaration

DECLARATION

I, Ken Forrest, hereby declare, under penalty of perjury as follows:

1. I am of legal age, a resident of the United States and Chief Financial Officer of Genovese, Joblove & Battista, P.A., (“GJB” or “Service Provider”) with offices in Florida located at 100 Southeast Second Street, 44th Floor, Miami, Florida 33131 (“Miami” or “Main Office”); 200 East Broward Boulevard, Suite 1110, Fort Lauderdale, Florida 33301 (“Ft. Lauderdale”) and 100 N. Tampa Street, Suite 2600, Tampa, Florida (“Tampa”). GJB also has an affiliate office in Caracas Venezuela located at Av. Francisco de Miranda, Torre Provincial "A" piso 8 oficina 81 y 82 1060 Caracas, Venezuela.

2. The facts set forth in this declaration are based upon my personal knowledge and the firm’s financial records that were reviewed by me or other GJB employees acting under my supervision and direction

3. I submit this declaration in support of the Monthly Fee Statement submitted for payment by GJB for the month of August 2020;

4. GJB is a professional association organized under the laws of the State of Florida in the United States with Employer ID 65-0518134. GJB is not engaged in any trade or business in Puerto Rico.

5. GJB’s taxable year ends on December 31 (the “Tax Year”).

6. GJB does not have an office or other fixed place of business within Puerto Rico, as described under Puerto Rico Treasury Regulation No. 6257.

7. The following fees and expenses relate to activities undertaken outside of Puerto Rico by the Service Provider as part of the PROMESA Title III proceedings during the fee period beginning on August 1, 2020 through August 31, 2020, which constitute gross income from sources outside Puerto Rico pursuant to the Puerto Rico Internal Revenue Code of 2011, as amended (the “Code”):

1. Commonwealth of Puerto Rico 001 Matter

i. *Services rendered outside of Puerto Rico*

Matter	Matter Name	Invoice Number	Fees	20% Discount (\$18,520.70)	Fees Requested to be Paid (90%)	Expenses Requested to be Paid (100%)	Fees & Expenses Requested to be Paid
12272-001	Promesa Special Conflicts Counsel	99158	\$92,603.50	\$74,082.80	\$66,674.52	\$7,093.72	\$73,768.24

2. Puerto Rico Electric Power Authority ("PREPA") 002 Matter

i. *Services rendered outside Puerto Rico*

Matter	Matter Name	Invoice Number	Fees	20% Discount (\$4,136.90)	Fees Requested to be Paid (90%)	Expenses Requested to be Paid (100%)	Fees & Expenses Requested to be Paid
12272-002	PREPA Adversary	99159	\$20,684.50	\$16,547.60	\$14,892.84	\$0.00	\$14,892.84

3. Employees Retirement System of the Government of the Commonwealth of Puerto Rico ("ERS") 003 Matter

i. *Services rendered outside Puerto Rico*

Matter	Matter Name	Invoice Number	Fees	20% Discount (\$460.00)	Fees Requested to be Paid (90%)	Expenses Requested to be Paid (100%)	Fees & Expenses Requested to be Paid
12272-003	ERS Litigation	99160	\$2,300.00	\$1,840.00	\$1,656.00	\$0.00	\$1,656.00

4. HTA Litigation- 004 Matter

i. *Services rendered outside Puerto Rico*

Matter	Matter Name	Invoice Number	Fees	20% Discount (\$87.90)	Fees Requested to be Paid (90%)	Expenses Requested to be Paid (100%)	Fees & Expenses Requested to be Paid
12272-004	HTA Litigation	99161	\$439.50	\$351.60	\$316.44	\$0.00	\$316.44

8. The invoices submitted in connection with the August Fee Statement and summarized above reflect the full amount billed by GJB for fees in the amount of \$116,027.50 plus costs of \$7,093.72 for a total of 123,121.22.

9. That under the GJB's retention order in the Title III cases, GJB agreed to a voluntary 20% reduction in its hourly fees sought to be paid in the amount of \$23,205.50 (20% discount). The costs are \$7,093.72. Accordingly, GJB seeks payment of \$83,539.80 in fees (90% of the total discounted fees) and \$7,093.72 in costs (100% of the costs) as detailed in the August Fee Statement for a total of \$90,633.52.

IN WITNESS WHEREOF, I hereby declare, under penalty of perjury, that the above statement is true and correct on this 20th day of October 2020, in Miami, Florida.



KEN FORREST

Exhibit C

Notice Parties

Counsel for the Oversight Board

Proskauer Rose LLP
Eleven Times Square
New York, NY
10036
Attn: Martin J. Bienenstock, Esq.
Ehud Barak Esq. and

Proskauer Rose LLP,
70 West Madison
Street, Chicago, IL
60602
Attn: Paul V. Possinger, Esq.

and

O'Neill & Borges LLC
250 Mulioz Rivera Ave., Suite 800
San Juan, PR 00918
Attn: Hermann D. Bauer, Esq.

Counsel for the Puerto Rico Fiscal Agency and Financial Advisory Authority

Marini Pietrantonio Muniz
LLC MCS Plaza, Suite 500
255 Ponce de León Ave
San Juan, PR 00917
Attn: Luis C. Marini-Biaggi, Esq.
Carolina Velaz-Rivero Esq.

The Office of the United States Trustee for the District of Puerto Rico

Edificio Ochoa
500 Tanca Street, Suite 301
San Juan, Puerto Rico 00901 (re: In Commonwealth of Puerto Rico)

Counsel for the Official Committee of Unsecured Creditors

Paul Hastings
200 Park Avenue
New York, NY 10166
Attn: Luc A. Despina, Esq.

Counsel for the Official Committee of Unsecured Creditors

Casillas, Santiago & Torres, LLC
El Caribe office Building
53 Palmeras Street, Ste. 1601
San Juan, Puerto Rico 00901
Attn: Juan J . Casillas Ayala, Esq.
Alberto J.E. Aneses Negron, Esq.

Counsel for the Fee Examiner

Godfrey & Kahn S.C.
One East Main Street, Suite 500
Madison, Wisconsin 53703-3300
Attn: Katherine Stadler, Esq.

and

EDGE Legal Strategies, PSG
252 Ponce de Le6n
Avenue Citibank Tower,
12th Floor San Juan, PR
00918
Attn: Eyck O. Luge

U.S. Trustee

Office of the United States Trustee for the District of Puerto Rico
Edificio Ochoa
500 Tanca Street, Suite 301
San Juan, PR 00901 (re: *In re: Commonwealth of Puerto Rico*)

Counsel for the Official Committee of Retired Employees

Jenner & Block LLP
919 Third Ave.
New York, NY 10022
Attn: Robert Gordon, Esq.
Richard Levin, Esq.

and

Jenner & Block LLP
353 N. Clark Street
Chicago, IL 60654
Attn: Catherine Steege, Esq.
Melissa Root, Esq.

and

Bennazar, Garcia & Milian, C.S.P.
Edificio Union Plaza, PH-A,
416 Ave. Ponce de Leon
Hate Rey, PR 00918
Attn: A.J. Bennazar-Zequiera, Esq.

Puerto Rico Department of Treasury

Puerto Rico Department of
Treasury

PO Box 9024140

San Juan, PR 00902-4140

Attn: Reylam Guerra Goderich, Deputy Assistant of Central Accounting
Omar E. Rodriguez Perez, CPA, Assistant Secretary of Central Accounting
Angel L. Pantoja Rodriguez, Deputy Assistant Secretary of Internal Revenue and Tax
Policy
Francisco Pares Alicea, Assistant Secretary of Internal Revenue and Tax Policy
Francisco Pefia Montanez, CPA, Assistant Secretary of the Treasury

Genovese Joblove & Battista, P.A.

100 Southeast Second Street, 44th Floor
Miami, Florida 33131
Telephone (305) 349-2300 Facsimile (305) 349-2310
Employer ID# 65-0518134

PROMESA - Official Committee of Unsecured Creditors

May 7, 2020
Please Refer to
Invoice Number: 97823

Attn:

GJB Tax ID No. 65-0518134

Re: PROMESA: Official Committee of Unsecured Creditors / Special Conflict Counsel

SUMMARY / REMITTANCE COPY

Client/Matter # 12272-001
PROMESA - Official Committee of Unsecured Creditors
PROMESA: Official Committee of Unsecured Creditors / Special Conflict Counsel

(Services rendered outside of Puerto Rico)

For fees for professional services for the period ending Feb 29, 2020	216,770.50
Costs incurred and advanced	<u>7,305.33</u>
Current Fees and Costs Due	224,075.83

We encourage our clients to pay via ACH, however, in the event that you pay by check, please send payment to the remittance address below:

TO PROTECT AGAINST FRAUD, the Firm will not change its wiring instructions via email. We strongly encourage clients to confirm any change in wiring instructions by contacting Ken Forrest @ 305-349-2312 or via email @ kforrest@gjb-law.com and requesting written and verbal confirmation.

Wiring and ACH Instructions:

Bank Name: Biscayne Bank
Bank Telephone: 305-447-5050
Account Name: Genovese Joblove & Battista, P.A. - Operating
Routing Number : 066015767
Account Number : 21007711

Remittance Address:

Genovese Joblove & Battista, P.A.
100 Southeast Second Street, 44th Floor
Miami, Florida 33131

For payment, please reference the invoice, client and matter number(s) being paid.
Please refer all questions to Ken Forrest @ 305-349-2312 or via email @ kforrest@gjb-law.com

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GJB Tax ID No. 65-0518134

Re: PROMESA: Official Committee of Unsecured Creditors / Special Conflict Counsel

FOR PROFESSIONAL SERVICES RENDERED
for the period ending Feb 29, 2020

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
B110 / Case Administration					
02/04/20	MGG	Review District Court approval of stipulation among the Title III Debtors and AAFAF tolling the statutory deadlines for avoidance and other actions for an additional six months Doc No. 10606.	0.20	575.00	115.00
02/05/20	MGG	Review status and highlights of Puerto Rico Bondholders Tentative Deal with Oversight Board.	0.40	575.00	230.00
02/05/20	IRS	Confer with paralegal staff regarding the deadlines in the Interim Case Management Order for Revenue Bonds issues on 1/31/2020 and review correspondence relating to same. (.4)	0.80	350.00	280.00
		Review order setting briefing schedule on government parties' motion regarding modification of litigation deadlines. (.1)			
		Review joinders to motion to dismiss filed in AP 19-297. (.3)			
02/09/20	JA	Prepare litigation update and strategize regarding assignments for coordination.	0.80	575.00	460.00
02/09/20	MGG	Review Oversight Boards Press Release and Presentation of Plan Support Agreement with GO Bondholders.	0.70	575.00	402.50
02/12/20	IRS	Prepare internal tracker sheet with task list and status report for each GJB-involved PROMESA matter.	0.60	350.00	210.00
02/18/20	IRS	Review extensive docket entry updates and recent order summaries. (.7)	0.70	350.00	245.00
		.			
02/21/20	JZ	Attention to calendaring and deadlines.	0.50	195.00	97.50

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02/25/20	JZ	Receipt and review of Order Regarding Procedures for Attendance, Participation and Observation of March 4-5, 2020 Omnibus Hearing; calendar deadlines; update electronic case profile.	0.30	195.00	58.50
Subtotal: B110 / Case Administration			5.00		\$2,098.50
B113 / Pleadings Review					
02/03/20	SS	Review and Analyze all court filings in the Main Case, Title III cases and Adversary Proceedings from late January 31 though February 2 in order to prepare digest of matters relevant to special litigation counsel and distribute to appropriate team members.	1.40	195.00	273.00
02/03/20	SS	Review and Analyze all court filings in the Main Case, Title III cases and Adversary Proceedings on February 3 in order to prepare digest of matters relevant to special litigation counsel and distribute to appropriate team members.	1.60	195.00	312.00
02/03/20	SS	Prepare digest of matters and filings on February 3 relevant to special litigation counsel and distribute to appropriate team members.	1.20	195.00	234.00
02/03/20	SS	Prepare digest of matters and filings from late January 31 through February 2 relevant to special litigation counsel and distribute to appropriate team members.	1.00	195.00	195.00
02/04/20	SS	Review and Analyze all court filings in the Main Case, Title III cases and Adversary Proceedings from late February 3 and February 4 in order to prepare digest of matters relevant to special litigation counsel and distribute to appropriate team members.	2.70	195.00	526.50
02/05/20	SS	Review and Analyze all court filings in the Main Case, Title III cases and Adversary Proceedings on February 5 in order to prepare digest of matters relevant to special litigation counsel and distribute to appropriate team members.	2.20	195.00	429.00
02/06/20	SS	Review and Analyze all court filings in the Main Case, Title III cases and Adversary Proceedings on February 6 in order to prepare digest of matters relevant to special litigation counsel and distribute to appropriate team members.	1.60	195.00	312.00
02/07/20	SS	Review and Analyze all court filings in the Main Case, Title III cases and Adversary Proceedings on February 7 in order to prepare digest of matters relevant to special litigation counsel and distribute to appropriate team members.	2.60	195.00	507.00
02/10/20	SS	Review and Analyze all court filings in the Main Case, Title III cases and Adversary Proceedings on February 10 in order to prepare digest of matters relevant to special litigation counsel and distribute to appropriate team members.	1.70	195.00	331.50
02/10/20	SS	Reviewed Amended Mediation report and , per request from J. Arrastia, and J. Genovese, gathered filings referred to in Amended Report.	1.60	195.00	312.00

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02/11/20	SS	Review and Analyze all court filings in the Main Case, Title III cases and Adversary Proceedings on February 11 in order to prepare digest of matters relevant to special litigation counsel and distribute to appropriate team members.	1.40	195.00	273.00
02/11/20	SS	Reviewed Amended mediation report and gathered filings referred to therein as requested by J. Arrastia and J. Genovese.	3.10	195.00	604.50
02/12/20	SS	Review and Analyze all court filings in the Main Case, Title III cases and Adversary Proceedings on February 12 in order to prepare digest of matters relevant to special litigation counsel and distribute to appropriate team members.	1.60	195.00	312.00
02/12/20	SS	Compleat review of Amended Mediation Report and gather all referenced pleadings cross-requested to J. Arastia and J. Genovese.	4.60	195.00	897.00
02/13/20	SS	Review and Analyze all court filings in the Main Case, Title III cases and Adversary Proceedings on February 13 in order to prepare digest of matters relevant to special litigation counsel and distribute to appropriate team members.	1.70	195.00	331.50
02/13/20	SS	Began to prepare digests of matters and filings from February 3 forward relevant to special litigation counsel and distribute to appropriate team members.	4.80	195.00	936.00
02/14/20	SS	Review and Analyze all court filings in the Main Case, Title III cases and Adversary Proceedings on February 14 in order to prepare digest of matters relevant to special litigation counsel and distribute to appropriate team members.	1.80	195.00	351.00
02/14/20	SS	Continued to prepare digest of matters and filings from February 13 forward relevant to special litigation counsel and distribute to appropriate team members.	5.30	195.00	1,033.50
02/18/20	SS	Review and Analyze all court filings in the Main Case, Title III cases and Adversary Proceedings form Late February 14 through February 17 in order to prepare digest of matters relevant to special litigation counsel and distribute to appropriate team members.	1.80	195.00	351.00
02/18/20	SS	Prepare digest of matters and filings from late on jFebruary 14 through February 17 relevant to special litigation counsel and distribute to appropriate team members.	1.10	195.00	214.50
02/18/20	SS	Review and Analyze all court filings in the Main Case, Title III cases and Adversary Proceedings on February 18 in order to prepare digest of matters relevant to special litigation counsel and distribute to appropriate team members.	1.80	195.00	351.00
02/18/20	SS	Prepare digest of matters and filings on February 18 relevant to special litigation counsel and distribute to appropriate team members.	1.30	195.00	253.50
02/19/20	SS	Review and Analyze all court filings in the Main Case, Title III cases and Adversary Proceedings, late on February 18 in order to prepare digest of matters relevant to special litigation counsel and distribute to appropriate team members.	1.60	195.00	312.00

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02/19/20	SS	Prepare digest of matters and filings late on February 18 relevant to special litigation counsel and distribute to appropriate team members.	1.30	195.00	253.50
02/19/20	SS	Review and Analyze all court filings in the Main Case, Title III cases and Adversary Proceedings on February 19 in order to prepare digest of matters relevant to special litigation counsel and distribute to appropriate team members.	1.30	195.00	253.50
02/19/20	SS	Prepare digest of matters and filings on February 19 relevant to special litigation counsel and distribute to appropriate team members.	1.30	195.00	253.50
02/20/20	SS	Review and Analyze all court filings in the Main Case, Title III cases and Adversary Proceedings late on February 19 in order to prepare digest of matters relevant to special litigation counsel and distribute to appropriate team members.	1.40	195.00	273.00
02/20/20	SS	Prepare digest of matters and filings from late February 19 relevant to special litigation counsel and distribute to appropriate team members.	1.30	195.00	253.50
02/20/20	SS	Review and Analyze all court filings in the Main Case, Title III cases and Adversary Proceedings on February 20 in order to prepare digest of matters relevant to special litigation counsel and distribute to appropriate team members.	1.60	195.00	312.00
02/20/20	SS	Prepare digest of matters and filings on February 20 relevant to special litigation counsel and distribute to appropriate team members.	1.40	195.00	273.00
02/21/20	SS	Review dockets and pleadings in all cases order to determine what matters involving our firm are scheduled to be heard at the March 4-5 Omnibus Hearing. Conf. w/ A. Castaldo re same.	4.60	195.00	897.00
02/21/20	SS	Review and Analyze all court filings in the Main Case, Title III cases and Adversary Proceedings On late February 20 and February 21 in order to prepare and prepare digest of matters relevant to special litigation counsel and distribute to appropriate team members.	2.10	195.00	409.50
02/21/20	SS	Prepare digest of matters and filings on February 21 relevant to special litigation counsel and distribute to appropriate team members.	0.70	195.00	136.50
02/24/20	SS	Review and Analyze all court filings in the Main Case, Title III cases and Adversary Proceedings from late February 21 through February 23 in order to prepare digest of matters relevant to special litigation counsel and distribute to appropriate team members.	1.70	195.00	331.50
02/24/20	SS	Prepare digest of matters and filings from late February 21 through February 23 relevant to special litigation counsel and distribute to appropriate team members.	1.30	195.00	253.50
02/24/20	SS	Review and Analyze all court filings in the Main Case, Title III cases and Adversary Proceedings on February 24 in order to prepare digest of matters relevant to special litigation counsel and distribute to appropriate team members.	1.70	195.00	331.50

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02/24/20	SS	Prepare digest of matters and filings on February 24 relevant to special litigation counsel and distribute to appropriate team members.	1.20	195.00	234.00
02/25/20	SS	Review and Analyze all court filings in the Main Case, Title III cases and Adversary Proceedings late on February 24 in order to prepare digest of matters relevant to special litigation counsel and distribute to appropriate team members.	2.60	195.00	507.00
02/25/20	SS	Prepare digest of matters and filings late on February 24 relevant to special litigation counsel and distribute to appropriate team members.	1.10	195.00	214.50
02/25/20	SS	Review and Analyze all court filings in the Main Case, Title III cases and Adversary Proceedings on February 25 in order to d prepare digest of matters relevant to special litigation counsel and distribute to appropriate team members.	1.80	195.00	351.00
02/25/20	SS	Prepare digest of matters and filings on February 25 relevant to special litigation counsel and distribute to appropriate team members.	1.20	195.00	234.00
02/26/20	SS	Review and Analyze all court filings in the Main Case, Title III cases and Adversary Proceedings from late February 25 in order to prepare digest of matters relevant to special litigation counsel and distribute to appropriate team members.	1.70	195.00	331.50
02/26/20	SS	Prepare digest of matters and filings from late February 25 relevant to special litigation counsel and distribute to appropriate team members.	1.20	195.00	234.00
02/26/20	SS	Review and Analyze all court filings in the Main Case, Title III cases and Adversary Proceedings on February 26 in order to prepare digest of matters relevant to special litigation counsel and distribute to appropriate team members.	1.60	195.00	312.00
02/26/20	SS	Prepare digest of matters and filings on February 25 relevant to special litigation counsel and distribute to appropriate team members.	1.30	195.00	253.50
02/27/20	SS	Review and Analyze all court filings in the Main Case, Title III cases and Adversary Proceedings from late February 26 in order to prepare digest of matters relevant to special litigation counsel and distribute to appropriate team members.	2.20	195.00	429.00
02/27/20	SS	Prepare digest of matters and filings from late February 26 relevant to special litigation counsel and distribute to appropriate team members.	1.30	195.00	253.50
02/27/20	SS	Review and Analyze all court filings in the Main Case, Title III cases and Adversary Proceedings on February 27 in order to prepare digest of matters relevant to special litigation counsel and distribute to appropriate team members.	1.80	195.00	351.00
02/27/20	SS	Prepare digest of matters and filings on February 27 relevant to special litigation counsel and distribute to appropriate team members.	1.30	195.00	253.50

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02/28/20	SS	Review and Analyze all court filings in the Main Case, Title III cases and Adversary Proceedings from late on February 27 in order to prepare digest of matters relevant to special litigation counsel and distribute to appropriate team members.	2.10	195.00	409.50
02/28/20	SS	Prepare digest of matters and filings from late on February 27 relevant to special litigation counsel and distribute to appropriate team members.	1.40	195.00	273.00
02/28/20	SS	Review and Analyze all court filings in the Main Case, Title III cases and Adversary Proceedings on February 28 in order to d prepare digest of matters relevant to special litigation counsel and distribute to appropriate team members.	2.30	195.00	448.50
02/28/20	SS	Prepare digest of matters and filings on February 28 relevant to special litigation counsel and distribute to appropriate team members.	1.30	195.00	253.50
Subtotal: B113 / Pleadings Review			98.60		\$19,227.00
B150 / Meetings of Creditors					
02/02/20	JA	Review correspondence to Committee regarding case strategy.	0.20	575.00	115.00
02/04/20	JA	Review correspondence.	0.10	575.00	57.50
02/05/20	MGG	Attend Committee Call.	0.50	575.00	287.50
02/12/20	MGG	Participate in Committee Call and confer with John Arrastia re: same.	0.70	575.00	402.50
02/12/20	JA	Confer with M. Guitian regarding committee call minutes.	0.10	575.00	57.50
02/18/20	JA	Review Committee correspondence.	0.30	575.00	172.50
02/24/20	JA	Telephone conference with A. Velazquez, Committee Chair, regarding litigation issues and strategy.	0.60	575.00	345.00
02/26/20	JA	Participate in meeting with Committee.	0.60	575.00	345.00
Subtotal: B150 / Meetings of Creditors			3.10		\$1,782.50
B155 / Court Hearings					
02/11/20	MGG	Review schedule of matters set for Ominbus Hearings on March 4, 2020 and meeting with C. Hopkins re: same; review of fee application deadlines and set up reminders.	0.40	575.00	230.00
02/11/20	CBH	Review of ominbus hearings on 3/4/20; meeting with M. Guitian regarding same; review of fee application deadline; calendar reminders.	0.40	195.00	78.00

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Subtotal: B155 / Court Hearings			0.80		\$308.00
B160 / Fee/Employment Applications					
02/04/20	CE	Preparation of GJB Monthly Fee Objection Statement; Interoffice meeting with M. Guitian re: same.	0.50	150.00	75.00
02/06/20	MGG	E-mail correspondence with C. Hopkins re: upcoming fee application deadline and review of invoices.	0.40	575.00	230.00
02/06/20	CBH	E-mail correspondence with M. Guitian regarding upcoming fee application deadline.	0.40	195.00	78.00
02/10/20	JA	Continued preparation of fee statements in conformity with fee examiner guidelines	0.80	575.00	460.00
02/11/20	MGG	Review prebills for December 2019 in preparation of December Fee Statement.	0.60	575.00	345.00
02/12/20	MGG	Conference with C. Hopkins re: attention to upcoming deadlines for interim fee application hearings and preparation of same.	0.40	575.00	230.00
02/12/20	CBH	Attention to upcoming deadlines prior to fee application hearing; review of time of preparation of fee application; meeting with M. Guitian regarding same.	0.80	195.00	156.00
02/12/20	CE	Review November and December invoices; Prepare Monthly Fee Cover Letter for November and December; E-mail correspondence with M. Guitian re: same.	1.10	150.00	165.00
02/13/20	JHG	Review GJB fee statements.	0.90	765.00	688.50
02/13/20	CBH	Review of time spent on last fee application; e-mail with M. Guitian regarding same.	0.30	195.00	58.50
02/14/20	MGG	Final review of November and December billings (.40). Draft email to Committee with summary (.40).	0.80	575.00	460.00
02/24/20	MGG	Email to and from John Arrastia re: monthly bills.	0.20	575.00	115.00
02/24/20	CBH	Begin preparation of third interim fee application.	0.50	195.00	97.50
02/25/20	MGG	Email to and from John Arrastia and Mark Hancock re: deferral of GJB's Interim Fee Application.	0.20	575.00	115.00
02/25/20	CBH	Continue preparation and formatting of third interim fee application (.7); attention to exhibits and declaration (.4); e-mail correspondence with accounting regarding billing reports (.3).	1.40	195.00	273.00
02/26/20	JA	Review Fee Examiner motion.	0.30	575.00	172.50
02/26/20	MGG	Review Fee Examiner's Report on Uncontested Professional Fee matters for consideration with the March 4, 2020 Omnibus Hearing.	0.30	575.00	172.50

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Subtotal: B160 / Fee/Employment Applications			9.90		\$3,891.50
B161 / Budgeting					
02/09/20	JA	Confer with J. Genovese and M. Guitian regarding budget adjustments to reflect revisions in forecast.	0.40	575.00	230.00
02/09/20	MGG	Emails to and from John Arrastia and John Genovese re: March Budget.	0.30	575.00	172.50
02/09/20	JA	Prepare and review fee statements in conformity with Fee Examiner guidelines.	1.10	575.00	632.50
02/12/20	MGG	Conference with John Arrastia re: March Budget (.20). Prepare March 2020 Budget (1.0). Emails to and from Mr. Arrastia with comments (.40). Revise and finalize Budget (.60).	2.20	575.00	1,265.00
02/13/20	JHG	Review proposed March budget.	0.80	765.00	612.00
02/13/20	MGG	Telephone conference with John Arrastia re: Budget (.20). Email to J. Genovese, Jesus Suarez re: same (.10). Revise and finalize March Budget (.50).	0.80	575.00	460.00
02/13/20	JA	Prepare and revise March budget.	0.60	575.00	345.00
02/18/20	MGG	Email to and from John Arrastia re: approval of monthly fees and Budget by Committee.	0.20	575.00	115.00
02/25/20	MGG	Email to and from John Arrastia re: March Budget.	0.20	575.00	115.00
02/26/20	MGG	Email to and from John Arrastia re: Committee's proposed adjustments to March Budget.	0.30	575.00	172.50
02/27/20	JZ	Receipt and review of Fee Examiner's Report on GJB's Fee Application; circulate same; calendar new hearing date.	0.40	195.00	78.00
Subtotal: B161 / Budgeting			7.30		\$4,197.50
B190 / Other Contested Matters					
02/07/20	MGG	Review and monitor Motions to dismiss filed by certain GO bondholder groups and the Lawful Constitutional Debt Coalition in response to omnibus objections to GO and PBA bond claims filed by the Committee and Oversight Board, including the Committee's recently-filed miscellaneous debt limit claim objection. Consider impact on pending litigation. (.50). Review update on Law 29 Legislation and litigation (.40).	0.90	575.00	517.50
02/11/20	AMC	Complete global spreadsheet reviewing, analyzing, and synthesizing causes of action handled by GJB	4.20	375.00	1,575.00
Subtotal: B190 / Other Contested Matters			5.10		\$2,092.50
B191 / General Litigation					

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02/02/20	MGG	Review and consider issues related to HTA, PRIFA, and CCDA motions seeking to lift the stay in the Commonwealth case to exercise remedies with respect to certain tax revenues that the Commonwealth "clawed back" from HTA, PRIFA and CCDA (.50). Review status of pleadings, responses, joinder and oppositions (.30).	0.80	575.00	460.00
02/02/20	JPB	Reviewed Kobre and Kim database documents in Batch JP5B, Tranche 1 (4 documents).	1.70	375.00	637.50
02/02/20	JPB	Reviewed Kobre and Kim database documents in Batch JP5B, Tranche 2 (3 documents).	1.80	375.00	675.00
02/03/20	JHG	Review daily summary prepared by S. Siff to identify and analyze strategic litigation issues.	0.80	765.00	612.00
02/03/20	JHG	Review and analysis of amended interim case management order from Revenue Bonds.	0.80	765.00	612.00
02/03/20	JHG	Review ECF 10593 joinder of Assured regarding discovery.	0.30	765.00	229.50
02/03/20	JHG	Review ECF 10604, urgent joint motion regarding discovery.	0.80	765.00	612.00
02/03/20	JMS	Review issues arising from first circuit lien avoidance opinion and review impact on underwriter litigation.	2.30	500.00	1,150.00
02/03/20	JA	Review amended Interim Case Management Order (.2); review Minute Order (.1)	0.30	575.00	172.50
02/03/20	ALG	Review financial related documents provided by Kobre Kim Report related to financial target claims and further identified as ALG Batch 6 (Docs 376 - 418) (1.4).	2.20	565.00	1,243.00
		Review financial related documents provided by Kobre Kim Report related to financial target claims and further identified as ALG Batch 6 (Docs 419 - 433) (.8).			
02/03/20	ALG	Review financial related documents provided by Kobre Kim Report related to financial target claims and further identified as ALG Batch 6 (Docs 541 - 572) (2.6).	2.60	565.00	1,469.00
02/03/20	JPB	Reviewed Kobre and Kim database documents in Batch JP5B, Tranche 4 and Tranche 5 (6) documents (10 documents).	3.90	375.00	1,462.50
02/03/20	SS	Review and Analyze documents on database produced by Kobre and Kim, Batch SS2, Tranche 34 (57 documents)	2.30	195.00	448.50
02/04/20	JHG	Review email from J. Arrastia and media regarding RSA.	0.80	765.00	612.00
02/04/20	JHG	Review J. Arrastia email regarding committee call and proposed budget.	0.90	765.00	688.50
02/04/20	JHG	Review ECF 10606 first amended stipulation and consent regarding tolling of statute of limitations.	0.60	765.00	459.00
02/04/20	JHG	Review orders scheduling status conference ECF 10607.	0.20	765.00	153.00

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02/04/20	JHG	Review ECF 10609, Bacardi opposition to Ambac motion.	0.80	765.00	612.00
02/04/20	JHG	Review email from Alex Bongartz with attachments and analysis regarding GO Bonds objections.	2.20	765.00	1,683.00
02/04/20	JA	Review correspondence regarding compliance with court orders relating to service.	0.10	575.00	57.50
02/04/20	ALG	Review financial related documents provided by Kobre Kim Report related to financial target claims and further identified as ALG Batch 6 (Docs 573 - 623) (1.7). Review financial related documents provided by Kobre Kim Report related to financial target claims and further identified as ALG Batch 6 (Docs 624 - 711).	3.00	565.00	1,695.00
02/04/20	JA	Email to J. Genovese re: RSA	0.20	575.00	115.00
02/04/20	JA	Email to J. Genovese re: committee call and proposed budget.	0.20	575.00	115.00
02/04/20	IRS	Review docket entry updates and recent order summaries prepared by S. Siff.	0.50	350.00	175.00
02/04/20	AMC	Reviewed and analyzed plan of adjustment vis-à-vis release language and post-confirmation trusts.	2.10	375.00	787.50
02/04/20	JPB	Reviewed Kobre and Kim database documents in Batch JP5B, Tranche 5 (13 documents) and Batch JP5B, Tranche 6 (6 documents).	4.20	375.00	1,575.00
02/04/20	JZ	Review of internal pleadings report circulated by S. Siff.	0.30	195.00	58.50
02/04/20	JZ	Attention to numerous e-mails regarding committee call.	0.30	195.00	58.50
02/04/20	JZ	Receipt and review of Order Withdrawing Motion to Stay Adversary Proceeding in ADV 19-00388.	0.10	195.00	19.50
02/04/20	SS	Review and Analyze database documents produced by Kobre and Kim, Batch SS2, Tranch 28 (36 documents)	1.20	195.00	234.00
02/04/20	SS	Review and Analyze documents in database produced by Kobre and Kim. Batch SS2, Tranch 35 (31 documents)	1.10	195.00	214.50
02/05/20	JHG	Review email from Alex Bongartz.	0.60	765.00	459.00
02/05/20	JHG	Review press reports regarding PREPA.	0.50	765.00	382.50
02/05/20	JHG	Review ECF 10678, order regarding insurance proceeds.	0.40	765.00	306.00
02/05/20	JHG	Review WSJ article on bondholders deal and conference regarding same.	0.40	765.00	306.00

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02/05/20	JA	Review Omnibus Motion to Dismiss Filed by LCDC as applicable ot Adversary Defendants (.8); Review Motion for Joinder (.1); Review Motion for Joinder by Blackrock (.1)p Review Urgent Motion for Bridge Order (.3); Review Order on Briefing Schedule (.1)	1.40	575.00	805.00
02/05/20	ALG	Review financial related documents provided by Kobre Kim Report related to financial target claims and further identified as ALG Batch 6 (Docs 712 - 772) (2.2). Review financial related documents provided by Kobre Kim Report related to financial target claims and further identified as ALG Batch 6 (Docs 773 - 803) (1.0).	3.20	565.00	1,808.00
02/05/20	JPB	Reviewed Kobre and Kim database documents in Batch JP5B, Tranche 7(16 documents).	2.30	375.00	862.50
02/05/20	JZ	Review of internal pleadings report circulated by S. Siff.	0.40	195.00	78.00
02/05/20	JZ	Revise consolidated adversary chart prepared by A. Castaldi to update deadlines.	0.40	195.00	78.00
02/05/20	JZ	Receipt and review of Omnibus Motion to Dismiss of the Lawful Constitutional Debt Coalition, Pursuant to Bankruptcy Rule 7012, of Claim Objections Filed or Asserted by the Financial Management Oversight Board for Puerto Rico and The Official Committee of Unsecured Creditor (.3); calendar hearing date and objection deadlines (.1); update electronic case profile (.1)	0.50	195.00	97.50
02/05/20	JZ	Receipt and review of Joinder to Motion to Dismiss filed by Ad Hoc Group; receipt and review of Joinder to Motion to Dismiss filed by QTBC Noteholder Group in ADV 19-297; calendar response deadline; circulate same; update electronic case profile.	0.60	195.00	117.00
02/06/20	JA	Review Motion for Bridge Order (.4); review Committee update (.4); review Motion for Joinder in Motion to Dismiss (.7); Review Urgent Joint Motion to Modify Discovery (.6); Review Motion for Joinder (.1); review Debtor's Motion for Modifications to Automatic Stay (.2); Reveiw Blackrock Motion for Joinder (.1); Review Order on Briefing Schedule (.1)	2.70	575.00	1,552.50
02/06/20	JMS	Review issues regarding joinder in Motions to dismiss by black rock and response strategy.	1.60	500.00	800.00
02/06/20	JA	Strategize regarding Joinders to the Motions to Dismiss and case plan	0.40	575.00	230.00
02/06/20	ALG	Review financial related documents provided by Kobre Kim Report related to financial target claims and further identified as ALG Batch 6 (Docs 804 - 823) (1.8). Review financial related documents provided by Kobre Kim Report related to financial target claims and further identified as ALG Batch 6 (Docs 824 -874) (1.9).	3.70	565.00	2,090.50

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02/06/20	JPB	Outline and and analyze Kobre and Kim documents related to underwriter defendant actions prior to 2009 in anticipation of drafting memorandum for client.	2.10	375.00	787.50
02/06/20	JPB	Outline and analyze Kobre and Kim documents related to underwriter defendant actions from 2013-2014 in anticipation of drafting memorandum for client.	3.60	375.00	1,350.00
02/06/20	JZ	Review of internal pleadings report circulated by S. Siff.	0.20	195.00	39.00
02/07/20	JHG	Review and analyze lengthy email from Alex Bongartz regarding Revenue Bond proceeding.	1.30	765.00	994.50
02/07/20	MGG	Review developments of Revenue Bond Adversary proceedings.	0.60	575.00	345.00
02/07/20	JA	Review Order Regarding Adjournment of Hearing (.1); Attention to Tolling Agreement Issues (.3)	0.40	575.00	230.00
02/07/20	JMS	Review developments concerning intervention in revenue bond adversary proceedings (.6); review motions to dismiss filed by GO bondholder groups and determine impact to underwriter litigation (1.2); attention to Law 29 litigation and potential impact on underwriter claims (.8)	2.60	500.00	1,300.00
02/07/20	ALG	Review financial related documents provided by Kobre Kim Report related to financial target claims and further identified as ALG Batch 6 (Docs 875 - 1000) (3.2). Review financial related documents provided by Kobre Kim Report related to financial target claims and further identified as ALG Batch 6 (Docs 1001 - 1089) (2.3).	5.50	565.00	3,107.50
02/07/20	JPB	Outline and analyze Kobre and Kim documents related to underwriter defendant actions from 2010-2011 in anticipation of drafting memorandum for client.	3.70	375.00	1,387.50
02/07/20	JZ	Review of internal pleadings report circulated by S. Siff.	0.30	195.00	58.50
02/07/20	JNS	Update and circulate email attaching updated tolling agreements chart.	0.30	75.00	22.50
02/07/20	SS	Review and Analyze dadtabase documents produced by Kobre and Kim, Baitch SS2, tranche 31 (28 documents)	0.70	195.00	136.50
02/08/20	ALG	Review financial related documents provided by Kobre Kim Report related to financial target claims and further identified as ALG Batch 6 (Docs 1090 - 1194) (2.1). Review financial related documents provided by Kobre Kim Report related to financial target claims and further identified as ALG Batch 6 (Docs 1195 - 1207) (1.8).	3.90	565.00	2,203.50
02/08/20	SS	Review and Analyze database documents produced by Kobre and Kim, Batch SS2, Tranche 32,(54 documents)	1.10	195.00	214.50

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02/09/20	MGG	Review Doc No. 10754 Motion of Official Committee of Unsecured Creditors for Order to (A) Setting Briefing Schedule and Hearing Date for Omnibus Objection to Claims Filed or Asserted Against Commonwealth by Holders of General Obligation Bonds Asserting Priority Over Other Commonwealth Unsecured Creditors [Docket No. 10638], (B) Approving Form of Notice and (C) Granting Related Relief.	0.20	575.00	115.00
02/09/20	MGG	Review Oversight Board's Presentation of PSA re: GO Bonds and Press release.	0.40	575.00	230.00
02/09/20	MGG	Review email from John Arrastia with follow-up action plan re: pending litigation.	0.30	575.00	172.50
02/09/20	JA	Review Committee materials and comment.	0.20	575.00	115.00
02/09/20	JPB	Outline and analyze Kobre and Kim documents related to communications between underwriters and PR agencies from 2013-2014 in anticipation of drafting memorandum for client.	3.20	375.00	1,200.00
02/10/20	JHG	Review email from J. Arrastia regarding government response to proposed restructure.	0.30	765.00	229.50
02/10/20	JHG	Review amended report and recommendation regarding mediation (ECF 10756).	3.60	765.00	2,754.00
02/10/20	JHG	Review email from Alex Bongartz.	0.50	765.00	382.50
02/10/20	JHG	Review ECF 10754 committee motion regarding briefing schedule.	0.40	765.00	306.00
02/10/20	MGG	Review and analyze Amended Report and Recommendation of the Mediation Team (1.7). Outline issues for discussion with Angela Castaldi re: impact of Mediation recommendations on pending litigation (.9)	2.60	575.00	1,495.00
02/10/20	JA	Review and analyze mediation statement (1.6); strategize with J. Genovese regarding litigation strategy regarding disclosures and confirmation (1.3); attention to tolling agreements (.3)	3.20	575.00	1,840.00
02/10/20	ALG	Review financial related documents provided by Kobre Kim Report related to financial target claims and further identified as ALG Batch 6 (Docs 1208 - 1278) (2.3).	4.90	565.00	2,768.50
		Review financial related documents provided by Kobre Kim Report related to financial target claims and further identified as ALG Batch 6 (Docs 1279 - 1284) (.5).			
		Review financial related documents provided by Kobre Kim Report related to financial target claims and further identified as ALG Batch 6 (Docs 1285 - 1370) (2.1).			
02/10/20	JA	Email to J. Genovese re: government response to proposed restructure.	0.30	575.00	172.50

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02/10/20	JMS	Review mediators report with attention to litigation issue (.6); review RSA agreement with attention to litigation issues (1.3); review tolling agreement with underwriter parties and execute same (.5)	2.40	500.00	1,200.00
02/10/20	AMC	Detailed analysis of Commonwealth Plan of Adjustment and corresponding Restructuring Support Agreement.	6.60	375.00	2,475.00
02/10/20	JPB	Outline and analyze Kobre and Kim documents related to communications between underwriters and credit rating agencies from 2013-2014 in anticipation of drafting memorandum for client.	3.90	375.00	1,462.50
02/10/20	JZ	Review of internal pleadings report circulated by S. Siff.	0.30	195.00	58.50
02/10/20	JNS	Update file and records with Second Amended Tolling Agreements for BNY Mellon and Greenberg Traurig, circulate executed copies, calendar new deadlines.	0.40	75.00	30.00
02/10/20	SS	Review and Analyze database documents produced by Kobre and Kim, Batch SS2, Tranche 33 (245 documents)	2.30	195.00	448.50
02/11/20	JHG	Review email from Alex Bongartz.	0.60	765.00	459.00
02/11/20	JHG	Review and analyze ECF 10808, joint motion regarding scheduling of hearing on disclosure statement.	1.10	765.00	841.50
02/11/20	JHG	Review ECF 10817, limited objection.	0.40	765.00	306.00
02/11/20	MGG	Review email from Angelo Castaldi (.2) and initial review of GJB Case Analysis (1.2)	1.40	575.00	805.00
02/11/20	JA	Review Joint Motion to Schedule Hearing on Adequacy of Disclosure Statement.	0.40	575.00	230.00
02/11/20	JA	Continued review and analysis of Amended Report and Recommendations of Mediation Team (1.2); review and analyze adversary cases and deadlines & status (1.1); review orders scheduling briefing [DE 1906] (.1)	2.40	575.00	1,380.00
02/11/20	ALG	Review financial related documents provided by Kobre Kim Report related to financial target claims and further identified as ALG Batch 6 (Docs 1371 - 1419) (1.3). Review financial related documents provided by Kobre Kim Report related to financial target claims and further identified as ALG Batch 6 (Docs 1420 - 1456) (1.3).	2.60	565.00	1,469.00
02/11/20	JMS	Continued attention to litigation issues arising from RSA/ Plan of Adjustment.	0.90	500.00	450.00
02/11/20	IRS	Review internal memoranda regarding pending matters and action plan for GJB PROMESA involvement going forward and confer regarding completion of internal tracking chart to monitor case progress.	0.40	350.00	140.00

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02/11/20	JPB	Outline and analyze Kobre and Kim documents related to communications between regarding ERS issuances (2007-08) in anticipation of drafting memorandum for client (3.4); Outline and analyze Kobre and Kim documents related to communications between regarding ERS systemic concerns (2010) in anticipation of drafting memorandum for client (2.9)	6.30	375.00	2,362.50
02/11/20	JZ	Review of internal pleadings report circulated by S. Siff.	0.40	195.00	78.00
02/11/20	JZ	Revise Consolidated Adversary Case Chart with Firm chart; e-mail same to A. Castaldi for review.	0.40	195.00	78.00
02/11/20	JZ	Conference with C. Hopkins regarding hearings scheduled at the March 3rd omnibus hearings.	0.30	195.00	58.50
02/11/20	JZ	Conference with J. Sardina to discuss tolling agreement schedule and calendaring of same.	0.40	195.00	78.00
02/11/20	JNS	Update file and records with Second Amended Tolling Agreements for Oriental Financial Services and Deloitte Financial Advisory Services, circulate executed copies, calendar new deadlines.	0.40	75.00	30.00
02/12/20	JA	Prepare for conference with Committee (.5); Committee call (.7); review status update regarding Committee (.2)	1.40	575.00	805.00
02/12/20	ALG	Review financial related documents provided by Kobre Kim Report related to financial target claims and further identified as ALG Batch 6 (Docs 1457 - 1547) (3.0).	4.50	565.00	2,542.50
		Review financial related documents provided by Kobre Kim Report related to financial target claims and further identified as ALG Batch 6 (Docs 1548 - 1612) (1.5).			
02/12/20	JPB	Outline and analyze Kobre and Kim documents related to communications [REDACTED] (2002-2007)	4.10	375.00	1,537.50
02/12/20	JZ	Review of internal pleadings report circulated by S. Siff.	0.20	195.00	39.00
02/13/20	MGG	Telephone conference with Angelo Castaldi re: analysis of pending litigation and excel spreadsheet (.40). Follow up conference with Mr. Castaldi re: Amended Report and Recommendation of Mediation Team (.20).	0.60	575.00	345.00
02/13/20	MGG	Continue work project with Angelo Castaldi re: analysis of pending litigation (.60). and impact of PSA (1.50)	2.10	575.00	1,207.50
02/13/20	ALG	Review financial related documents provided by Kobre Kim Report related to financial target claims and further identified as ALG Batch 6 (Docs 1613 - 1702) (2.7).	2.70	565.00	1,525.50
02/13/20	AMC	Conference call to discuss data compilation of case deadlines/case analyses.	0.40	375.00	150.00
02/13/20	JPB	Review and analyze Prospectus for Santander Target Maturity Fund II dated September 28, 2001 [REDACTED]	3.60	375.00	1,350.00

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02/13/20	JZ	Review of internal pleadings report circulated by S. Siff.	0.40	195.00	78.00
02/13/20	JNS	Attention to tolling agreements regarding AP280.	0.60	75.00	45.00
02/14/20	JHG	Review email from Nicholas Vass.	0.70	765.00	535.50
02/14/20	JHG	Review ECF 10958, opposition to urgent motion of Assured.	0.80	765.00	612.00
02/14/20	JHG	Review ECF 10964, AAFAF's limited joinder, review ECF 1909 in 17-04780, UCC joinder in urgent motion.	0.30	765.00	229.50
02/14/20	JHG	Review email from Alex Bongartz.	0.40	765.00	306.00
02/14/20	JHG	Review ECF 117549066 in appeal 20-1065, brief regarding independent trustee for avoidance claims.	1.40	765.00	1,071.00
02/14/20	JHG	Review ECF 117549075 in appeal 20-1065 employee committee brief.	1.20	765.00	918.00
02/14/20	JA	Review Motion of Joinder re: Motion to Adjourn March 4 Hearing	0.10	575.00	57.50
02/14/20	ALG	Review financial related documents provided by Kobre Kim Report related to financial target claims and further identified as ALG Batch 6 (Docs 1703 - 1785) (2.0).	1.00	565.00	565.00
02/14/20	JPB	Review and analyze Prospectus for Santander Target Maturity Fund IV dated October 31, 2002 in anticipation of revising Amended Complaint.	2.30	375.00	862.50
02/14/20	JZ	Review of internal pleadings report circulated by S. Siff.	0.20	195.00	39.00
02/14/20	JNS	Attention to tolling agreements regarding AP280.	0.30	75.00	22.50
02/15/20	JPB	Outline and analyze Kobre and Kim documents related to communications [REDACTED] (2008-2014)	4.80	375.00	1,800.00
02/17/20	ALG	Review financial related documents provided by Kobre Kim Report [REDACTED] and further identified as ALG Batch 6 (Docs 1786 - 1846) (2.6).	2.60	565.00	1,469.00
02/17/20	JPB	Review and analyze Prospectus for Santander Tax Advantaged Target Maturity Fund I dated September 3, 2003 [REDACTED]	3.20	375.00	1,200.00
02/17/20	SS	Continued review and Analysis of database documents produced by Kobre and Kim , Batch SS2, tranche 36 (25 documents).	0.70	195.00	136.50
02/18/20	JHG	Review ECF 10996, FOMB regarding scheduling of 9019 hearing.	0.60	765.00	459.00

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02/18/20	JHG	Review ECF 10997 AAFAF's reply for further extension of RSA.	0.50	765.00	382.50
02/18/20	JHG	Review ECF 11060, fourth urgent consented motion for extension.	0.30	765.00	229.50
02/18/20	JA	Review Notice of Correspondence [DE 10821] (.3)	0.30	575.00	172.50
02/18/20	ALG	Review financial related documents provided by Kobre Kim Report [REDACTED] and further identified as ALG Batch 6 (Docs 1847 - 1850) (0.7).	0.70	565.00	395.50
02/18/20	ALG	Review financial related documents provided by Kobre Kim Report [REDACTED] and further identified as ALG Batch 6 (Docs 1851 - 1895) (1.7).	2.40	565.00	1,356.00
		Review financial related documents provided by Kobre Kim Report [REDACTED] and further identified as ALG Batch 6 (Docs 1896 - 1935) (0.7).			
02/18/20	JMS	Prepare for committee call, attention to status of litigation handled by GJB and impact of RSA and plan agreements.	2.40	500.00	1,200.00
02/18/20	AMC	Research concerning propriety (and requirements) of plan releases in debtor plan of reorganization.	1.70	375.00	637.50
02/18/20	JPB	Review and analyze Prospectus for Santander Tax Advantaged Target Maturity Fund II dated February 27, 2004 in anticipation of revising Amended Complaint.	3.90	375.00	1,462.50
02/18/20	JZ	Review of daily synopsis of pleadings circulated by S. Siff.	0.30	195.00	58.50
02/18/20	JNS	Update file and records with Second Amended Tolling Agreements in AP280, circulate executed copies, calendar new deadlines.	0.40	75.00	30.00
02/18/20	SS	Reviewed and analyzed documents on database produced by Kobre and Kim, Batch SS2, Tranche 36 (45 documents)	2.20	195.00	429.00
02/19/20	JHG	Review Prime Clerk notice and analyze ECF 11159, Puerto Rico Fiscal Agency motion regarding disclosure statement.	1.20	765.00	918.00
02/19/20	ALG	Review financial related documents provided by Kobre Kim Report [REDACTED] and further identified as ALG Batch 6 (Docs 2116 - 2150) (1.3).	3.30	565.00	1,864.50
		Review financial related documents provided by Kobre Kim Report [REDACTED] and further identified as ALG Batch 6 (Docs 2151 - 2167) (0.7).			
		Review financial related documents provided by Kobre Kim Report [REDACTED] and further identified as ALG Batch 6 (Docs 2168 - 2201) (1.3).			

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02/19/20	ALG	Review financial related documents provided by Kobre Kim Report [REDACTED] and further identified as ALG Batch 6 (Docs 1936 - 2014) (1.7).	3.70	565.00	2,090.50
		Review financial related documents provided by Kobre Kim Report [REDACTED] and further identified as ALG Batch 6 (Docs 2015 - 2050) (0.7).			
		Review financial related documents provided by Kobre Kim Report [REDACTED] and further identified as ALG Batch 6 (Docs 2051 - 2115) (1.3).			
02/19/20	JPB	Outline and analyze Kobre and Kim documents related to communications between regarding use of loan proceeds in issuances from 2007-2009 [REDACTED]	3.90	375.00	1,462.50
02/19/20	JZ	Review of internal pleadings report circulated by S. Siff.	0.40	195.00	78.00
02/19/20	JNS	Update file and records with Second Amended Tolling Agreements in AP280, circulate executed copies, calendar new deadlines.	0.60	75.00	45.00
02/19/20	SS	Reviewed and Analyzed documents on database produced by Kobre and Kim, Batch SS2, Tranche 37,(30 documents)	1.10	195.00	214.50
02/20/20	JA	Confer with L. Despins (.2); review UBS Joinder (.1); review FOMB Opposition to UCC Motion for Intervention (.6); review Monoline Opposition to Motion to Intervene (.4)	1.30	575.00	747.50
02/20/20	JA	Conduct team meeting regarding Committee assigned litigation issues.	0.60	575.00	345.00
02/20/20	ALG	Review financial related documents provided by Kobre Kim Report [REDACTED] and further identified as ALG Batch 6 (Docs 2202 - 2262) (1.2).	3.90	565.00	2,203.50
		Review financial related documents provided by Kobre Kim Report [REDACTED] and further identified as ALG Batch 6 (Docs 2263 - 2400) (2.7).			
02/20/20	IRS	Strategy meeting to discuss upcoming projects and pending matters relating to February Disclosure deadline and October Plan confirmation hearings. (.6)	0.60	350.00	210.00
02/20/20	AMC	Team meeting to discuss prospective case strategy in respect of upcoming disclosure statement / plan filings.	0.60	375.00	225.00
02/20/20	AMC	Strategize concerning recent filings in adversary proceedings.	0.30	375.00	112.50
02/20/20	JPB	Analyze Santander Securities reports regarding closed end funds prior to 2010 in anticipation of revising Amended Complaint.	3.30	375.00	1,237.50
02/20/20	JZ	Review of internal pleadings report circulated by S. Siff.	0.30	195.00	58.50

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02/20/20	JZ	Receipt and review of Order Granting Urgent Motion to Adjourn March 4, 2020 Hearing on Bondholders' and Government Parties' Motions to Dismiss Amended Complaints in Adversary Proceedings; calendar hearing date; circulate same; update electronic case profile.	0.30	195.00	58.50
02/20/20	SS	Review and analyze database documents produced by Kobre and Kim Batch SS2, Tranche 38 (27 document)	1.20	195.00	234.00
02/21/20	JA	Strategize with Jesus Suarez re: tolling issues (.3); review Assured Objection to Mediation Report (.7); review Committee response to Pre-Solicitation Motion (.4); strategize regarding litigation strategy (2.1).	3.50	575.00	2,012.50
02/21/20	ALG	Review financial related documents provided by Kobre Kim Report [REDACTED] and further identified as ALG Batch 6 (Docs 2401 - 2442) (2.1)	2.10	565.00	1,186.50
02/21/20	JPB	Analyze Santander Securities reports regarding closed end funds sold 2010-2012 in anticipation of revising Amended Complaint.	4.30	375.00	1,612.50
02/21/20	JZ	Review of internal pleadings report circulated by S. Siff.	0.20	195.00	39.00
02/22/20	JPB	Analyze Santander Securities reports regarding closed end funds sold 2012-2013 [REDACTED]	1.00	375.00	375.00
02/23/20	JA	Research and analysis regarding litigation strategy issues.	0.60	575.00	345.00
02/23/20	AMC	Reviewed, analyzed, and notated Amended Report and Recommendation of Mediation Team (1.1); Reviewed, analyzed, and notated AAFAP's objection to ECF No. 10808 and ECF No. 10839 (.4); Reviewed, analyzed, and notated multiple "joint statements" of defendants in Adv. Case No. 19-280 (.3); Reviewed, analyzed, and notated Court's order on urgent joint motion to modify discovery and briefing schedule with respect to certain contested matters and compare same against recommendations made by Mediation Team (.4); Reviewed, analyzed, and notated omnibus response of Committee to amended report and recommendation of mediation team and Oversight Board's filings at ECF No. 10808 and ECF No. 10839 (1.2); Reviewed and analyzed Common Interest and Cooperation Agreement between Committee and FOMB (.4)	3.80	375.00	1,425.00
02/24/20	JHG	Review daily summary from S. Siff to identify and analyze strategic litigation issues contained in amended mediation team report..	0.80	765.00	612.00
02/24/20	JHG	Review ECF 11492, FOMB response to amended report and recommendation of mediation team.	1.20	765.00	918.00
02/24/20	JHG	Review ECF 11493, Assured's objection to report and recommendation.	1.10	765.00	841.50
02/24/20	JHG	Review ECF 11495, DRA parties response to report and recommendation; review (ECF 11496), AMBAC's response to report and recommendation.	1.00	765.00	765.00

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02/24/20	JHG	Review (ECF 11498), supplemental response of National Finance to amend report and recommendation.	0.80	765.00	612.00
02/24/20	JHG	Review (ECF 11499) joint statement in support of amended report and recommendation.	1.60	765.00	1,224.00
02/24/20	JA	Legal research and analysis regarding litigation strategy and issues (1.2); review proposed materials regarding potential discovery and litigation issues (1.4)	2.60	575.00	1,495.00
02/24/20	JA	Conference with J. Zamora re: deadlines	0.40	575.00	230.00
02/24/20	ALG	Review financial related documents provided by Kobre Kim Report related to financial target claims and further identified as ALG Batch 6 (Docs 2443 - 2500) (1.7).	3.40	565.00	1,921.00
		Review financial related documents provided by Kobre Kim Report related to financial target claims and further identified as ALG Batch 7 (Docs 1 - 60) (1.7).			
02/24/20	JMS	Research in support of [REDACTED]	1.90	500.00	950.00
02/24/20	AMC	Reviewed, analyzed, and notated: response of FOMB to amended mediation report; and Assured response / objection to amended report / recommendation by mediation team.	0.80	375.00	300.00
02/24/20	AMC	Reviewed, analyzed, and notated Committee's prospective filing concerning Rule 2019 disclosures, the DRA Parties' Response to the Amended Report and Recommendation of the Mediation Team, and the supplemental responses of AMBAC and Assured to the Amended Report and Recommendation of the Mediation team.	1.80	375.00	675.00
02/24/20	JPB	Outline and analyze Kobre and Kim documents related to communications between regarding use of loan proceeds in issuances in 2011 in anticipation of drafting memorandum for client.	4.30	375.00	1,612.50
02/24/20	JZ	Conference with J. Arrastia to discuss calendaring and upcoming deadlines.	0.40	195.00	78.00
02/24/20	JZ	Receipt and review of Omnibus Opposition to the Amended Report of the Mediation Team; update electronic case profile.	0.30	195.00	58.50
02/24/20	JZ	Review of daily synopsis of pleadings circulated by S. Siff.	0.20	195.00	39.00
02/24/20	SS	Review and Analyze database documents produced by Kobre and Kim, Batch SS2, Tranche 39 (30 documents)	1.30	195.00	253.50
02/25/20	JHG	Review email from Alex Bongartz regarding draft response and PSA consideration analysis.	1.60	765.00	1,224.00
02/25/20	JHG	Review daily summary prepared by S. Siff to identify and analyze strategic litigation issues.	0.50	765.00	382.50
02/25/20	JHG	Review (ECF 11684) DRA parties urgent motion.	0.50	765.00	382.50

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02/25/20	JHG	Review and analysis of (ECF 11686) Assured and related parties urgent motion regarding production of documents.	1.20	765.00	918.00
02/25/20	JHG	Review (ECF 11687), urgent motion regarding production.	1.50	765.00	1,147.50
02/25/20	JA	Attention to tolling agreements (.1); review correspondence (.3); review motion on procedures (.1); review briefing order (.1)	0.60	575.00	345.00
02/25/20	ALG	Review financial related documents provided by Kobre Kim Report related to financial target claims and further identified as ALG Batch 7 (Docs 61 - 100) (1.7).	4.30	565.00	2,429.50
		Review financial related documents provided by Kobre Kim Report related to financial target claims and further identified as ALG Batch 7 (Docs 101 - 150) (1.3).; Review financial related documents provided by Kobre Kim Report related to financial target claims and further identified as ALG Batch 7 (Docs 151 - 206) (1.3).			
02/25/20	AMC	Review all GJB adversary proceedings and contested matters, analyze status, and draft internal memorandum concerning the same.	3.20	375.00	1,200.00
02/25/20	AMC	Review of plan support agreement made public earlier this month, and begin analysis concerning how any plan pursuant to such PSA may effect existing adversary proceedings / contested matters.	4.10	375.00	1,537.50
02/25/20	JPB	Outline and analyze Kobre and Kim documents related to communications between regarding use of loan proceeds in issuances in 2012 in anticipation of drafting memorandum for client.	3.80	375.00	1,425.00
02/25/20	JZ	Review of daily synopsis of pleadings circulated by S. Siff.	0.40	195.00	78.00
02/25/20	JZ	Review of dockets and calendar to create list of hearings scheduled for 3/4/20 per A. Castaldi's instructions.	0.80	195.00	156.00
02/25/20	JNS	Update file and records with Second Amended Tolling Agreements regarding AP280, circulate executed copies, calendar new deadlines.	0.60	75.00	45.00
02/25/20	SS	Review and analyze database documents produced by Kobre and Kim, Batch SS2, Tranche 40 (24 documents)	1.00	195.00	195.00
02/26/20	JHG	Review daily summary from S. Siff to identify and analyze strategic litigation issues.	0.70	765.00	535.50
02/26/20	JA	Stragetize with JP Bado re: research into Kobre Kim documents and [REDACTED] litigation strategy (.6); strategize with A. Castaldi regarding [REDACTED] issues and litigation strategy (.8); legal research and analysis regarding [REDACTED] and remedies (1.3)	2.70	575.00	1,552.50
02/26/20	ALG	Review financial related documents provided by Kobre Kim Report related to financial target claims and further identified as ALG Batch 7 (Docs 207 - 253)	1.20	565.00	678.00

PROMESA - Official Committee of Unsecured Creditors
12272-001
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02/26/20	IRS	Review extensive order summaries and docket entry updates provided by S. Siff in relation to upcoming omnibus hearing.	0.80	350.00	280.00
02/26/20	AMC	Analyze recent Rule 2019 disclosures and interests disclosed therein.	0.90	375.00	337.50
02/26/20	JPB	Outline and analyze Kobre and Kim documents related to communications between regarding use of loan proceeds in issuances in 2014 [REDACTED]	4.70	375.00	1,762.50
02/26/20	AMC	Strategize with J. Arrastia regarding [REDACTED] issues and strategize regarding litigation.	0.80	375.00	300.00
02/26/20	JPB	Review and analyze Prospectus for Santander Target Maturity Fund III dated February 25, 2002 in anticipation of revising Amended Complaint.	2.30	375.00	862.50
02/26/20	JZ	Review of daily synopsis of pleadings circulated by S. Siff.	0.30	195.00	58.50
02/26/20	JZ	Receipt and review of Order Setting Briefing Schedule on Motion of Official Committee of Unsecured Creditors to Amend Tenth Amended Notice, Case Management and Administrative Procedures Regarding Disclosure Requirements; circulate same; calendar deadlines; update electronic case profile.	0.40	195.00	78.00
02/26/20	SS	Review and analyze database documents produced by Kobre and Kim, Batch SS2, Tranche 41 (35 documents)	1.40	195.00	273.00
02/27/20	JHG	Review email from Alex Bongartz and attached complaint.	0.80	765.00	612.00
02/27/20	JHG	Review daily summary from S. Siff to identify and analyze strategic litigation issues.	0.90	765.00	688.50
02/27/20	JHG	Review ECF 1177, Court Order on informative motion.	0.30	765.00	229.50
02/27/20	JHG	Review ECF 11773, omnibus reply regarding procedures motion.	0.70	765.00	535.50
02/27/20	JHG	Review ECF 11776, FOMB's omnibus reply.	1.40	765.00	1,071.00
02/27/20	JHG	Review and analysis of ECF 1178, UCC informative motion regarding retired employees.	0.40	765.00	306.00
02/27/20	JHG	Confer and strategize with J. Arrastia regarding themes and remedies.	1.40	765.00	1,071.00
02/27/20	JA	Additional strategy regarding potential litigation claims and issues relating to disclosure and confirmation (1.8); confer and strategize with John Genovese regarding themes and remedies (1.4); legal research and analysis (.9)	4.10	575.00	2,357.50

PROMESA - Official Committee of Unsecured Creditors
12272-001
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02/27/20	ALG	Review financial related documents provided by Kobre Kim Report [REDACTED] and further identified as ALG Batch 7 (Docs 254 - 294) (1.7)	4.40	565.00	2,486.00
		Review financial related documents provided by Kobre Kim Report [REDACTED] and further identified as ALG Batch 7 (Docs 295 - 380) (2.7)			
02/27/20	JMS	Additional research in support of development of claims relating to [REDACTED].	1.80	500.00	900.00
02/27/20	AMC	Research concerning the case law development in the area of [REDACTED], as analyzed under Rule 3001 and s. 502, and s. 510(c).	2.20	375.00	825.00
02/27/20	JPB	Analyze Kobre and Kim documents related to communications between regarding [REDACTED]	3.90	375.00	1,462.50
02/27/20	SS	Review and analyze database documents produced by Kobre and Kim, Batch SS2, Tranche 42 (20 documents)	0.80	195.00	156.00
02/27/20	JZ	Receipt and review of Magistrate's Order allowing limited intervention by the DRA Parties in the Monolines Amended Lift Stay Litigation; calendar deadlines; update electronic case profile.	0.30	195.00	58.50
02/27/20	JZ	Review of daily synopsis of pleadings circulated by S. Siff.	0.40	195.00	78.00
02/28/20	JHG	Review email from S. Siff and ECF 11853 UCC informative motion regarding March 3-4, 2020 hearing.	0.80	765.00	612.00
02/28/20	ALG	Review financial related documents provided by Kobre Kim Report related to financial target claims and further identified as ALG Batch 7 (Docs 381 - 461)	2.70	565.00	1,525.50
02/28/20	JPB	Analyze Kobre and Kim documents related to communications between [REDACTED]	1.40	375.00	525.00
02/28/20	JPB	Analyze Kobre and Kim documents related to communications between regarding swap transactions enacted between 2004-2008 in anticipation [REDACTED]	1.60	375.00	600.00
02/28/20	JPB	Further review and analysis of Prospectus for Santander mutual funds 2002-2003 in [REDACTED]	2.70	375.00	1,012.50
02/29/20	JPB	Revise draft memorandum to client regarding Kobre and Kim documents [REDACTED].	3.70	375.00	1,387.50
Subtotal: B191 / General Litigation			338.50		\$162,095.50
B320 / Plan and Disclosure Statement					
02/09/20	JA	Continued review and analysis of PSA (2.3); review oversight and board press release (.6); review FOMB press release (.2)	3.10	575.00	1,782.50

PROMESA - Official Committee of Unsecured Creditors
12272-001
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02/09/20	JA	Review and analyze specific Amended Plan Support Agreement issue.	0.70	575.00	402.50
02/09/20	MGG	Review Reorg summary of GO Bondholders Plan Support Agreement.	0.30	575.00	172.50
02/09/20	MGG	Review terms of the GO Bondholder deal and Plan Support Agreement.	1.60	575.00	920.00
02/11/20	MGG	Review Doc No. 10809 - Joint Motion to Schedule Hearing on Adequacy of Disclosure Statement. and Establishing Deadlines. Confer with John Arrastia.	0.40	575.00	230.00
02/12/20	JMS	Continued attention to litigation issues arising from RSA/ Plan of Adjustment.	2.40	500.00	1,200.00
02/12/20	JA	Initial review of motion establishing pre-solicitation procedures and deadlines.	1.10	575.00	632.50
02/12/20	MGG	Review with Angelo Castaldi preliminary analysis of impact of recently-announced PSA on existing GJB litigation matters.	0.60	575.00	345.00
02/12/20	AMC	Preliminary analysis of impact of recently-announced PSA on existing GJB litigations.	0.60	375.00	225.00
02/14/20	JA	Continued review and analyze Plan Support Agreement (1.1); continued review of Disclosure Statement (2.3)	3.40	575.00	1,955.00
02/14/20	MGG	Review and analyze Plan Support Agreement (1.0); Review Disclosure Statement (1.0) with emphasis on Releases; and litigation trusts for discussion and analysis with litigation team.	2.00	575.00	1,150.00
02/18/20	MGG	Review Doc No. 11121 - Limited Response by Committee of Retired Employees re: scheduling of hearing to consider adequacy of Disclosure Statement.	0.20	575.00	115.00
02/19/20	JA	Review Fiscal Agent Objection to Motion to Schedule Disclosure Hearing and Response to Mediation Team (.3); review Joint Statement of Adversary Defendants re: Proposed Stay (.2); review Joint Statement of Adversary Defendants re: extension (.2); review Retiree Committee Limited Response to Scheduling Motion (.1); Monoline Objection to Scheduling Motion (.4); review PSA Creditors Objections re: Go Objection (.5); strategize with Jesus Suarez regarding Committee Instructions (.4).	2.10	575.00	1,207.50
02/20/20	JA	Confer with L. Despina (.1); analyze draft Response of Committee to Mediator's Report and Disclosure Statement (1.2); strategize with Mike Friedman regarding same (.6)	1.80	575.00	1,035.00
02/20/20	MAF	Confer with J. Arrastia regarding pending issues related to disclosure, potential research issues, next steps and strategy.	0.60	550.00	330.00
02/25/20	MGG	Review analysis of PSA and impact on overall plan and litigation. (1.0). Confer with Angelo Castaldi re: same.	1.00	575.00	575.00
02/26/20	MGG	Analysis of Plan Consideration under PSA and impact on pending litigation.	1.00	575.00	575.00

PROMESA - Official Committee of Unsecured Creditors
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02/26/20	MAF	Conference with A Castaldi regarding research project concerning committee position with respect to impact of bond trading on plan and disclosure.	0.50	550.00	275.00
02/27/20	MGG	Review Doc No. 11776 Omnibus Reply of Board re: Disclosure Statement Scheduling and Pre-Solicitation Procedures.	0.20	575.00	115.00
02/27/20	JA	Review draft motion regarding claims under PSA (.4); strategize regarding classification as related to potential litigation (.3)	0.70	575.00	402.50
02/27/20	MAF	Detailed review of letter from PR clearing house regarding insider claims trading activity (0.8); review and consider draft 3013 motion (0.9).	1.70	550.00	935.00
02/28/20	MGG	General review of Doc No. 11947 Disclosure Statement for the Amended Title III Joint Plan of Adjustment of the Commonwealth of Puerto Rico, et al. with Attachments.	1.20	575.00	690.00
02/28/20	JA	Legal research and analysis regarding anticipated plan confirmation case issues (2.3); Additional case strategy development regarding plan confirmation issues (1.4)	3.70	575.00	2,127.50
02/29/20	MGG	Preliminary Review of Doc No. 11946 Joint Amended Title III Plan (.80) and Doc No. 11950 Joint Motion for Order Approving DISCO and Fixing Dates (.30).	1.10	575.00	632.50
02/29/20	JA	Initial review of Amended Joint Plan of Disclosure and Disclosure Statement.	3.30	575.00	1,897.50
Subtotal: B320 / Plan and Disclosure Statement			35.30		\$19,927.50
B420 / Restructurings					
02/03/20	MGG	Review Partial Joinder of Creditor Committee in Support of Opposition to Ambac's Stay Relief Motion ECF No. 10634 (.10); Committee's Joinder in Support of Opposition of Commonwealth of Puerto Rico to Amended PRIFA Bondholder Motion to Lift Automatic Stay ECF No. 10602/ 10635] (.20); and Review of Omnibus Objection of Committee to Claims Filed or Asserted Against Commonwealth by Holders of General Obligation Bonds Asserting Priority Over Other Commonwealth Unsecured Creditors Doc No. 10638 (.10) and impact on overall pending litigation.	0.40	575.00	230.00
02/12/20	MGG	Review Commonwealth Plan Support Agreement.	1.60	575.00	920.00
Subtotal: B420 / Restructurings			2.00		\$1,150.00
Total			505.60		\$216,770.50

PROMESA - Official Committee of Unsecured Creditors
12272-001
Invoice No. 97823

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Timekeeper Summary

<u>ID</u>	<u>Timekeeper Name</u>	<u>Title</u>	<u>BillHours</u>	<u>BillRate</u>	<u>BillAmount</u>
JHG	John H Genovese	Sr. Partner	46.60	765.00	35,649.00
JMS	Jesus M Suarez	Partner	18.30	500.00	9,150.00
MAF	Michael A Friedman	Partner	2.80	550.00	1,540.00
ALG	Alfredo L Gonzalez	Partner	74.50	565.00	42,092.50
MGG	Mariaelena Gayo-Guitian	Partner	31.30	575.00	17,997.50
JA	John Arrastia	Partner	56.20	575.00	32,315.00
IRS	Irina R Sadovnic	Associate	4.40	350.00	1,540.00
JPB	JP Bado	Associate	99.50	375.00	37,312.50
AMC	Angelo M Castaldi	Associate	34.10	375.00	12,787.50
JNS	Jessey N Sardina	Paralegal	3.60	75.00	270.00
CE	Carolyn Esser	Paralegal	1.60	150.00	240.00
CBH	Colleen B Hopkins	Paralegal	3.80	195.00	741.00
SS	Steve Siff	Paralegal	117.00	195.00	22,815.00
JZ	Johana Zamora	Paralegal	11.90	195.00	2,320.50
Total			505.60		\$216,770.50

Costs and incurrent and advanced

<u>Date</u>	<u>Description</u>	<u>Amount</u>
	Copies	201.40
02/29/2020	Data management and hosting (12272-001) Trustpoint.One 20-01835	7,103.93

Total Costs incurrent and advanced

\$7,305.33

Current Fees and Costs

\$224,075.83

Genovese Joblove & Battista, P.A.

100 Southeast Second Street, 44th Floor
Miami, Florida 33131
Telephone (305) 349-2300 Facsimile (305) 349-2310
Employer ID# 65-0518134

PROMESA - Official Committee of Unsecured Creditors

May 7, 2020
Please Refer to
Invoice Number: 97820

Attn:

GJB Tax ID No. 65-0518134

Re: PROMESA: Official Committee of Unsecured Creditors / PREPA Adversary - Puerto Rico Electric Power Authority

SUMMARY / REMITTANCE COPY

Client/Matter # 12272-002

PROMESA - Official Committee of Unsecured Creditors

PROMESA: Official Committee of Unsecured Creditors / PREPA Adversary - Puerto Rico Electric Power Authority

(Services rendered outside of Puerto Rico)

For fees for professional services
for the period ending Feb 29, 2020

9,722.50

Costs incurred and advanced

8.55

Current Fees and Costs Due

9,731.05

We encourage our clients to pay via ACH, however, in the event that you pay by check, please send payment to the remittance address below:

TO PROTECT AGAINST FRAUD, the Firm will not change its wiring instructions via email. We strongly encourage clients to confirm any change in wiring instructions by contacting Ken Forrest @ 305-349-2312 or via email @ kforrest@gjb-law.com and requesting written and verbal confirmation.

Wiring and ACH Instructions:

Bank Name: Biscayne Bank
Bank Telephone: 305-447-5050
Account Name: Genovese Joblove & Battista, P.A. - Operating
Routing Number : 066015767
Account Number : 21007711

Remittance Address:

Genovese Joblove & Battista, P.A.
100 Southeast Second Street, 44th Floor
Miami, Florida 33131

For payment, please reference the invoice, client and matter number(s) being paid.
Please refer all questions to Ken Forrest @ 305-349-2312 or via email @ kforrest@gjb-law.com

Genovese Joblove & Battista, P.A.

100 Southeast Second Street, 44th Floor
Miami, Florida 33131
Telephone (305) 349-2300 Facsimile (305) 349-2310
Employer ID# 65-0518134

PROMESA - Official Committee of Unsecured Creditors

May 7, 2020
Please Refer to
Invoice Number: 97820

Attn:

GJB Tax ID No. 65-0518134

Re: PROMESA: Official Committee of Unsecured Creditors / PREPA Adversary - Puerto Rico Electric Power Authority

FOR PROFESSIONAL SERVICES RENDERED
for the period ending Feb 29, 2020

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
B110 / Case Administration					
02/05/20	MGG	Review comments and status of PREPA RSA.	0.50	575.00	287.50
02/12/20	JA	Review and analyze task tracker chart for litigation actions, plan and case strategy.	0.80	575.00	460.00
Subtotal: B110 / Case Administration			1.30		\$747.50
B190 / Other Contested Matters					
02/03/20	JA	Review Reply to Motion in Limine (.4); review Motion in Limine (.4)	0.80	575.00	460.00
02/03/20	MGG	Receipt and review PREPA 1886- Tenth Revised Order Modifying Certain Deadlines Applicable to the PREPA 9019 Motion.	0.30	575.00	172.50
02/03/20	MGG	Review PREPA docket ECF Nos. 10597-10603 and general deadlines for responses in connection with Hearings scheduled for March 5, 2020.	0.50	575.00	287.50
02/04/20	IRS	Review analysis regarding PREPA 9019 motion and hearing dates.	0.20	350.00	70.00
02/05/20	JZ	Receipt and review of Urgent motion of Government Parties for (1) Bridge Order Pending Determination of their Motion for a Revised Scheduling Order; and (2) Eleventh Revised Order Modifying Certain Deadlines Applicable to PREPA 9019 (.3); receipt and review of briefing schedule on same (.2); calendar deadlines; circulate and update electronic case profile (.2)	0.70	195.00	136.50
02/07/20	JA	Review Correspondence regarding Objections to Exhibit List relating to 9019 Motion (.2)	0.20	575.00	115.00

PROMESA - Official Committee of Unsecured Creditors
12272-002
Invoice No. 97820

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02/07/20	MGG	Review and analyze RSA filed by Oversight Board in conjunction with Rule 9019 and analyze impact on PREPA adversary proceedings.	1.00	575.00	575.00
02/10/20	MGG	Review Doc No. 10817 response by Committee to to government parties' motion to amend the schedule in connection with the PREPA 9019 hearing (.30) and Doc No. 10818 Joint Response of Fuel Line Lenders to Scheduling Motion and impact on pending adversaries (.40).	0.70	575.00	402.50
02/11/20	JA	Review statement of FOMB regarding government approval of RSA (.2); review Opposition to Motion for Bridge Order (.5); review Committee Objection (.2); review Joint Response of Fuel Line Lenders (.2)	1.10	575.00	632.50
02/11/20	MGG	Review responses Doc No.s 10818/ 1902 /10817 to the government parties' motion to amend the schedule in connection with the PREPA 9019 hearing filed by (i) Assured and National and (ii) the Fuel Line Lenders and SREAEE/UTIER. Consider impact on deadlines set forth in RSA and pending litigation.	0.40	575.00	230.00
02/12/20	JA	Review Fuel Line Lender Response to PREPA 9019 Motion (.2); review Committee Motion and Reservation of Rights (.2); review Assured Objection to 9019 (.3)	0.70	575.00	402.50
02/13/20	JA	Review PREPA position statement on RSA.	0.20	575.00	115.00
02/13/20	JZ	Receipt and review of Order on Motion in Limine to Strike and Exclude Improper Lay Opinion Testimony of Frederic Chapados Regarding Alleged Effect of 9019 Settlement on PREPA; circulate same.	0.30	195.00	58.50
02/14/20	JA	Review Order on Motion in Limine [DE 1908]	0.40	575.00	230.00
02/18/20	JA	Review Eleventh Revised Order re: RSA (.1); review Scheduling Order (.1); review Order Extending Deadlines (.1)	0.30	575.00	172.50
02/18/20	MGG	Review DOC No. 1914 Eleventh Revised Order Establishing Deadline re: 9019 Motion.	0.20	575.00	115.00
02/25/20	JA	Review Objection to Joint Motion to Approve Settlement [DE 1919].	2.80	575.00	1,610.00
02/25/20	JZ	Receipt and review of UCC's Objection to the 9019 Motion; circulate same; update electronic case profile.	0.40	195.00	78.00
02/26/20	MGG	Review and consider Committee's Objection to PREPA' 9019 Motion for Order Approving RSA. Doc No. 11740. (.30). Review Doc No. 11770 re: Deadlines for Responses to Rule 2019 Motions (.10).	0.40	575.00	230.00
Subtotal: B190 / Other Contested Matters			11.60		\$6,093.00

B191 / General Litigation

PROMESA - Official Committee of Unsecured Creditors
12272-002
Invoice No. 97820

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02/04/20	JHG	Review daily summary prepared by S. Siff to identify and analyze strategic litigation issues, review urgent motion ECF 10604 regarding discovery.	0.80	765.00	612.00
02/04/20	JHG	Review PREPA ECF 1894 order.	0.20	765.00	153.00
02/04/20	JMS	Review PREPA RSA issues arising from legislative declaration and analyze litigation issues in fuel oil case.	1.70	500.00	850.00
02/04/20	JZ	Receipt and review of Order on Status Conference on Cobra Acquisitions LLC's Motion for Allowance and Payment of Administrative Expense Claims; calendar objection deadline and hearing date; update electronic case profile.	0.30	195.00	58.50
02/04/20	JZ	Receipt and review of Order Denying Renewed Motion of Puerto Rico Electric Power Authority for Undisputed Payment and Release of Insurance Proceeds; circulate same; update electronic case profile.	0.30	195.00	58.50
02/07/20	JA	Review relevant parties of Motion to Dismiss Claim Objections of GO Bonds [DE 10702] as it relates to adversary proceedings.	1.60	575.00	920.00
Subtotal: B191 / General Litigation			4.90		\$2,652.00
B320 / Plan and Disclosure Statement					
02/14/20	JA	Review Response to Bridge Motion.	0.10	575.00	57.50
02/18/20	JA	Objection and Reservation of Rights as to Motion to Schedule Adequacy of Disclosure.	0.30	575.00	172.50
Subtotal: B320 / Plan and Disclosure Statement			0.40		\$230.00
Total			18.20		\$9,722.50

Timekeeper Summary

<u>ID</u>	<u>Timekeeper Name</u>	<u>Title</u>	<u>BillHours</u>	<u>BillRate</u>	<u>BillAmount</u>
JHG	John H Genovese	Sr. Partner	1.00	765.00	765.00
JMS	Jesus M Suarez	Partner	1.70	500.00	850.00
MGG	Mariaelena Gayo-Guitian	Partner	4.00	575.00	2,300.00
JA	John Arrastia	Partner	9.30	575.00	5,347.50
IRS	Irina R Sadovnic	Associate	0.20	350.00	70.00
JZ	Johana Zamora	Paralegal	2.00	195.00	390.00
Total			18.20		\$9,722.50

Costs and incurrent and advanced

<u>Date</u>	<u>Description</u>	<u>Amount</u>
	Copies	8.55
Total Costs incurrent and advanced		\$8.55

PROMESA - Official Committee of Unsecured Creditors
12272-002
Invoice No. 97820

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Current Fees and Costs

\$9,731.05

Genovese Joblove & Battista, P.A.

100 Southeast Second Street, 44th Floor
Miami, Florida 33131
Telephone (305) 349-2300 Facsimile (305) 349-2310
Employer ID# 65-0518134

PROMESA - Official Committee of Unsecured Creditors

May 7, 2020
Please Refer to
Invoice Number: 97821

Attn:

GJB Tax ID No. 65-0518134

Re: PROMESA: Official Committee of Unsecured Creditors / ERS Litigation - Employees Retirement System of the
~~Government - Commonwealth of Puerto Rico~~

SUMMARY / REMITTANCE COPY

Client/Matter # 12272-003

PROMESA - Official Committee of Unsecured Creditors

PROMESA: Official Committee of Unsecured Creditors / ERS Litigation - Employees Retirement System of the Government
Commonwealth of Puerto Rico

(Services rendered outside of Puerto Rico)

For fees for professional services
for the period ending Feb 29, 2020

10,701.50

Costs incurred and advanced

32.70

Current Fees and Costs Due

10,734.20

We encourage our clients to pay via ACH, however, in the event that you pay by check, please send payment to the remittance address below:

TO PROTECT AGAINST FRAUD, the Firm will not change its wiring instructions via email. We strongly encourage clients to confirm any change in wiring instructions by contacting Ken Forrest @ 305-349-2312 or via email @ kforrest@gjb-law.com and requesting written and verbal confirmation.

Wiring and ACH Instructions:

Bank Name: Biscayne Bank
Bank Telephone: 305-447-5050
Account Name: Genovese Joblove & Battista, P.A. - Operating
Routing Number : 066015767
Account Number : 21007711

Remittance Address:

Genovese Joblove & Battista, P.A.
100 Southeast Second Street, 44th Floor
Miami, Florida 33131

For payment, please reference the invoice, client and matter number(s) being paid.
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100 Southeast Second Street, 44th Floor
Miami, Florida 33131
Telephone (305) 349-2300 Facsimile (305) 349-2310
Employer ID# 65-0518134

PROMESA - Official Committee of Unsecured Creditors

May 7, 2020
Please Refer to
Invoice Number: 97821

Attn:

GJB Tax ID No. 65-0518134

Re: PROMESA: Official Committee of Unsecured Creditors / ERS Litigation - Employees Retirement System of the
~~Government - Commonwealth of Puerto Rico~~

FOR PROFESSIONAL SERVICES RENDERED
for the period ending Feb 29, 2020

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
B110 / Case Administration					
02/18/20	IRS	Review pending deadlines in ERS cases as applicable to GJB-involved matters. (.6)	0.60	350.00	210.00
Subtotal: B110 / Case Administration			0.60		\$210.00
B190 / Other Contested Matters					
02/21/20	MGG	Review Doc No. 11482 Committee's Omnibus Response to Mediation Amended Report and for an Order Scheduling a Hearing to Consider Adequacy of Information Contained in Disclosure Statement and impact on pending litigation.	0.30	575.00	172.50
Subtotal: B190 / Other Contested Matters			0.30		\$172.50
B191 / General Litigation					
02/03/20	JA	Review motion regarding briefing schedule (.1); review correspondence regarding production (.1); review court order (.1)	0.30	575.00	172.50
02/04/20	JHG	Review ECF 806 in ERS urgent discovery motion.	0.80	765.00	612.00

PROMESA - Official Committee of Unsecured Creditors
12272-003
Invoice No. 97821

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02/04/20	IRS	Attend to correspondence regarding ERS third party discovery and internal review process. (.5)	2.80	350.00	980.00
		Review Motion to Modify Litigation Schedule. (.2)			
		Review analysis regarding First Circuit rulings on Section 552 contribution cuts. (.3)			
		Review and save third party discovery served up to February 3, 2020. (1.2)			
		Confer with IT department regarding storage and review of third-party e-discovery. (.3)			
		Prepare correspondence regarding e-discovery and storage issues relating to Third-Party discovery. (.3)			
02/04/20	JZ	Receipt and review of Urgent Joint Motion to Modify Discovery and Briefing Schedule with Respect to Certain Issues Raised in Certain Contested Matters and Adversary Proceedings Related to the Bonds Issued by ERS (.3); receipt and review of Order Scheduling Briefing Schedule on Motion(.1); calendar deadlines; circulate same; update electronic case profile (.3)	0.70	195.00	136.50
02/05/20	JMS	Attention to agreement with GO Bondholders and evaluate impact on underwriter litigation.	1.30	500.00	650.00
02/05/20	JZ	Coordinate service of Amended Interim Case Management Order for Revenue Bonds in english and spanish upon Defendants in ADV 19-364 via Prime clerk; verify defendants; update electronic case profile.	0.50	195.00	97.50
02/07/20	JA	Review Scheduling Order (.3); review scheduling Order in AP-355 (.3); Review Scheduling Order in various matters (.2); Review summary of GO Group Motion to Dismiss as it relates to specific AP Defendants (.4)	1.20	575.00	690.00
02/07/20	IRS	Review follow-up correspondence regarding selection of Spanish language expert.	0.10	350.00	35.00
02/07/20	JZ	Receipt and review of the Order on Urgent Joint Motion to Modify Discovery and Briefing Schedule With Respect to Certain Contested Matters and Adversary Proceedings Related to the Bonds Issued by the Employees Retirement System filed in ADV 19-367, 19-361, 19-360, 19-359, 19-357, 19-356 and 19-355 (.3); calendar all deadline contained in order (.2); update each electronic case profile (.2)	0.70	195.00	136.50
02/10/20	JA	Strategize with Angelo Castaldi regarding dismissal or amendment of action relating to specific defendant.	0.30	575.00	172.50
02/10/20	AMC	Research of authorities under Rule 15 and Rule 21 concerning pleading amendments and adding/dropping parties.	0.60	375.00	225.00
02/10/20	JZ	Receipt and review of Motion Submitting Amended Report and Recommendation of the Mediation Team with proposed scheduling order; circulate same; update electronic case profile.	0.40	195.00	78.00

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02/11/20	JA	Receive correspondence regarding discovery production of Fiscal Agent.	0.10	575.00	57.50
02/11/20	IRS	Review correspondence regarding ERS Spanish language expert.	0.10	350.00	35.00
02/11/20	JZ	Receipt and review of Joint Motion of the Commonwealth of Puerto Rico, the Employees Retirement System of the Government of the Commonwealth of Puerto Rico, and the Puerto Rico Public Buildings Authority for an Order (I) Scheduling a Hearing to Consider the Adequacy of Information Contained in the Disclosure Statement, (II) Establishing the Deadline for Filing Spanish Translation of the Disclosure Statement, (III) Establishing the Deadline for Filing Objections to the Disclosure Statement and Replies Thereto, and (IV) Granting Related Relief; (.3) calendar hearing date and objection deadline; (circulate same; update electronic case profile (.3)	0.60	195.00	117.00
02/12/20	JA	Review fiscal agent production - correspondence (.1); review supplemental interrogatory response (.2)	0.30	575.00	172.50
02/12/20	IRS	Prepare correspondence regarding discovery received from the Fiscal Agent relating to Ultra Vires issues and coordinate download and storage of all documents received.	0.40	350.00	140.00
02/14/20	JA	Review discovery correspondence (.1); review correspondence and motion regarding service (.1); review various discovery communications (.4)	0.60	575.00	345.00
02/14/20	IRS	Review correspondence regarding selection of Spanish language expert for ERS Adversary proceedings. (.1) Review draft supplemental interrogatory responses to Bondholders' first set of interrogatories. (.3)	0.40	350.00	140.00
02/18/20	JA	Attention to correspondence regarding deposition of Aleynia.	0.20	575.00	115.00
02/18/20	JZ	Receipt and review of Urgent Motion for Substitute Service of Deposition Subpoena on Juan Cancel Alegria in ADV 19-00356; circulate same; update electronic case profile.	0.40	195.00	78.00
02/19/20	JMS	Participate in committee call with respect to GJB litigation and draft follow-up memorandum regarding call (1.8); preliminary research issues concerning disclosure requirements by bondholders party to RSA (2.3)	4.10	500.00	2,050.00
02/19/20	JA	Review Limited Response of UCC to Pre-Solicitation Procedures, et al.	0.10	575.00	57.50
02/20/20	JMS	Meeting with GJB litigation group and preliminary analysis concerning disclosure requirements by bondholders party to RSA and potential claim development (1.6)	1.60	500.00	800.00
02/20/20	JA	Review supplemental interrogatory responses.	0.40	575.00	230.00
02/20/20	JZ	Draft preliminary Amended Complaint in adversary 19-355; e-mail same to A. Castaldi for review.	0.80	195.00	156.00

PROMESA - Official Committee of Unsecured Creditors
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02/21/20	JA	Review correspondence among counsel regarding discovery (.2); review production correspondence (.1)	0.30	575.00	172.50
02/24/20	JA	Attention to revisions of 19.355 Amended Complaint (.3); revise correspondence regarding privilege log for Ultra Vires discovery (.3); review email correspondence regarding depositions (.1)	0.70	575.00	402.50
02/24/20	AMC	Attend to revisions to amended complaint for filing in Adv . Case No. 19-355.	0.90	375.00	337.50
02/24/20	IRS	Coordinate download and storage of Bondholder discovery received 2.24.2020. (.4)	0.60	350.00	210.00
		Review Bondholders' supplemental interrogatory responses. (.2)			
02/25/20	JA	Review deposition emails.	0.20	575.00	115.00
02/27/20	JA	Review multiple correspondence regarding depositions (.1);	0.10	575.00	57.50
02/27/20	IRS	Review 3rd draft informative motion regarding notice of participation and notice of appearance filed in connection with the objections to the ERS bond claims and correspondence regarding same.	0.40	350.00	140.00
02/28/20	JA	Reveiw correspondence regarding discovery (.2);	0.20	575.00	115.00
02/28/20	IRS	Save and catalogue ERS third party discovery received on 2.21.2020 and 2.24.2020 from Bondholders.	0.50	350.00	175.00
Subtotal: B191 / General Litigation			23.70		\$10,204.00
B320 / Plan and Disclosure Statement					
02/20/20	MGG	Review Doc No. 813 - Response of Committee to Order Establishing Pre-Solicitation Procedures for Certain Holders of Retirement Claims and Establishing Solicitation of Plan (.20).	0.20	575.00	115.00
Subtotal: B320 / Plan and Disclosure Statement			0.20		\$115.00
Total			24.80		\$10,701.50

PROMESA - Official Committee of Unsecured Creditors
12272-003
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Timekeeper Summary

<u>ID</u>	<u>Timekeeper Name</u>	<u>Title</u>	<u>BillHours</u>	<u>BillRate</u>	<u>BillAmount</u>
JHG	John H Genovese	Sr. Partner	0.80	765.00	612.00
JMS	Jesus M Suarez	Partner	7.00	500.00	3,500.00
MGG	Mariaelena Gayo-Guitian	Partner	0.50	575.00	287.50
JA	John Arrastia	Partner	5.00	575.00	2,875.00
IRS	Irina R Sadovnic	Associate	5.90	350.00	2,065.00
AMC	Angelo M Castaldi	Associate	1.50	375.00	562.50
JZ	Johana Zamora	Paralegal	4.10	195.00	799.50
Total			24.80		\$10,701.50

Costs and incurrent and advanced

<u>Date</u>	<u>Description</u>	<u>Amount</u>
	Copies	32.70
Total Costs incurrent and advanced		\$32.70
Current Fees and Costs		\$10,734.20

Genovese Joblove & Battista, P.A.

100 Southeast Second Street, 44th Floor
Miami, Florida 33131
Telephone (305) 349-2300 Facsimile (305) 349-2310
Employer ID# 65-0518134

PROMESA - Official Committee of Unsecured Creditors

May 7, 2020
Please Refer to
Invoice Number: 97822

Attn:

GJB Tax ID No. 65-0518134

Re: PROMESA: Official Committee of Unsecured Creditors / HTA Litigation - Puerto Rico Highways & Transportation Authority

SUMMARY / REMITTANCE COPY

Client/Matter # 12272-004

PROMESA - Official Committee of Unsecured Creditors

PROMESA: Official Committee of Unsecured Creditors / HTA Litigation - Puerto Rico Highways & Transportation Authority

(Services rendered outside of Puerto Rico)

For fees for professional services
for the period ending Feb 29, 2020

1,345.00

Costs incurred and advanced

Current Fees and Costs Due

1,345.00

We encourage our clients to pay via ACH, however, in the event that you pay by check, please send payment to the remittance address below:

TO PROTECT AGAINST FRAUD, the Firm will not change its wiring instructions via email. We strongly encourage clients to confirm any change in wiring instructions by contacting Ken Forrest @ 305-349-2312 or via email @ kforrest@gjb-law.com and requesting written and verbal confirmation.

Wiring and ACH Instructions:

Bank Name: Biscayne Bank
Bank Telephone: 305-447-5050
Account Name: Genovese Joblove & Battista, P.A. - Operating
Routing Number : 066015767
Account Number : 21007711

Remittance Address:

Genovese Joblove & Battista, P.A.
100 Southeast Second Street, 44th Floor
Miami, Florida 33131

For payment, please reference the invoice, client and matter number(s) being paid.
Please refer all questions to Ken Forrest @ 305-349-2312 or via email @ kforrest@gjb-law.com

Genovese Joblove & Battista, P.A.

100 Southeast Second Street, 44th Floor
Miami, Florida 33131
Telephone (305) 349-2300 Facsimile (305) 349-2310
Employer ID# 65-0518134

PROMESA - Official Committee of Unsecured Creditors

May 7, 2020
Please Refer to
Invoice Number: 97822

Attn:

GJB Tax ID No. 65-0518134

Re: PROMESA: Official Committee of Unsecured Creditors / HTA Litigation - Puerto Rico Highways & Transportation
Authority

FOR PROFESSIONAL SERVICES RENDERED
for the period ending Feb 29, 2020

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
B191 / General Litigation					
02/03/20	JA	Review draft motion and draft joinder regarding lift stay.	0.80	575.00	460.00
02/03/20	MGG	Receipt and review Amended the Interim Case management Order for Revenue Bonds re: (ECF 10591) (ECF 101023 and impact on adversary proceedings.	0.30	575.00	172.50
02/11/20	JA	Review Motion to Intervene in HTA Complaint and strategize.	0.50	575.00	287.50
02/13/20	JZ	Receipt and review of Order Scheduling Briefing on Urgent motion of Assured Guaranty Corp., Assured Guaranty Municipal Corp., Ambac Assurance Corporation, National Public Finance Guarantee Corporation, And Financial Guaranty Insurance Company To Adjourn Hearing On Motions For Relief From The Automatic Stay and Extend Deadline For Replies In Support Of Motions For Relief From The Automatic Stay; calendar deadlines; update electronic case profile.	0.30	195.00	58.50
02/13/20	JZ	Receipt and review of Order Granting Motions for Relief from the Automatic Stay and Extend Deadlines for Replies in Support of Motions for Relief from the Automatic Stay; calendar hearing date; circulate same; update electronic case profile.	0.30	195.00	58.50
02/14/20	JZ	Receipt and review of Objections to Urgent motion of Assured Guaranty Corp., Assured Guaranty Municipal Corp., Ambac Assurance Corporation, National Public Finance Guarantee Corporation, And Financial Guaranty Insurance Company To Adjourn Hearing On Motions For Relief From The Automatic Stay and Extend Deadline For Replies In Support Of Motions For Relief From The Automatic Stay in the HTA case; circulate same; update electronic case profile.	0.40	195.00	78.00

PROMESA - Official Committee of Unsecured Creditors
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02/19/20	MGG	Review Doc No. 11285 - Notice of Joint Stipulation Regarding motion for relief from stay and DRA Parties' motion in support of Monoline Amended lift Stay litigation Doc No. 10835.	0.40	575.00	230.00
Subtotal: B191 / General Litigation			3.00		\$1,345.00
Total			3.00		\$1,345.00

Timekeeper Summary

<u>ID</u>	<u>Timekeeper Name</u>	<u>Title</u>	<u>BillHours</u>	<u>BillRate</u>	<u>BillAmount</u>
MGG	Mariaelena Gayo-Guitian	Partner	0.70	575.00	402.50
JA	John Arrastia	Partner	1.30	575.00	747.50
JZ	Johana Zamora	Paralegal	1.00	195.00	195.00
Total			3.00		\$1,345.00

Current Fees and Costs

\$1,345.00

Genovese Joblove & Battista, P.A.

100 Southeast Second Street, 44th Floor
Miami, Florida 33131
Telephone (305) 349-2300 Facsimile (305) 349-2310
Employer ID# 65-0518134

PROMESA - Official Committee of Unsecured Creditors

July 7, 2020
Please Refer to
Invoice Number: 98307

Attn:

GJB Tax ID No. 65-0518134

Re: PROMESA: Official Committee of Unsecured Creditors / Special Conflict Counsel

SUMMARY / REMITTANCE COPY

Client/Matter # 12272-001
PROMESA - Official Committee of Unsecured Creditors
PROMESA: Official Committee of Unsecured Creditors / Special Conflict Counsel

(Services rendered outside of Puerto Rico)

For fees for professional services for the period ending Mar 31, 2020	239,853.50
Costs incurred and advanced	<u>5,257.86</u>
Current Fees and Costs Due	245,111.36

We encourage our clients to pay via ACH, however, in the event that you pay by check, please send payment to the remittance address below:

TO PROTECT AGAINST FRAUD, the Firm will not change its wiring instructions via email. We strongly encourage clients to confirm any change in wiring instructions by contacting Ken Forrest @ 305-349-2312 or via email @ kforrest@gjb-law.com and requesting written and verbal confirmation.

Wiring and ACH Instructions:

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Bank Telephone: 305-447-5050
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Routing Number : 066015767
Account Number : 21007711

Remittance Address:

Genovese Joblove & Battista, P.A.
100 Southeast Second Street, 44th Floor
Miami, Florida 33131

For payment, please reference the invoice, client and matter number(s) being paid.
Please refer all questions to Ken Forrest @ 305-349-2312 or via email @ kforrest@gjb-law.com

Genovese Joblove & Battista, P.A.

100 Southeast Second Street, 44th Floor
Miami, Florida 33131
Telephone (305) 349-2300 Facsimile (305) 349-2310
Employer ID# 65-0518134

PROMESA - Official Committee of Unsecured Creditors

July 7, 2020
Please Refer to
Invoice Number: 98307

Attn:

GJB Tax ID No. 65-0518134

Re: PROMESA: Official Committee of Unsecured Creditors / Special Conflict Counsel

FOR PROFESSIONAL SERVICES RENDERED
for the period ending Mar 31, 2020

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
03/10/20	ALG	Review financial related documents provided by Kobre Kim Report related to financial target claims and further identified as ALG Batch 7 (Docs 1262 - 1332) (2.1).	2.60	565.00	1,469.00
Subtotal: /			2.60		\$1,469.00
B110 / Case Administration					
03/02/20	JZ	Review of daily filings synopsis circulated by S. Siff for calendaring, docketing, further analysis, and assignment.	0.20	195.00	39.00
03/02/20	JZ	Receipt and review of Order Approving Eleventh Amended Notice, Case Management and Administrative Procedures; circulate same; update electronic case profile.	0.30	195.00	58.50
03/03/20	JZ	Review of daily filings synopsis circulated by S. Siff for calendaring, docketing, further analysis, and assignment.	0.30	195.00	58.50
03/03/20	JZ	Receipt and review of Notice of Agenda of Matters scheduled for the hearing on March 4th and 5th; circulate same; update electronic case profile.	0.30	195.00	58.50
03/04/20	JZ	Review of daily filings synopsis circulated by S. Siff for calendaring, docketing, further analysis, and assignment.	0.30	195.00	58.50
03/05/20	JA	Review and analyze all pending matters and status with respect to strategy (.8)	0.80	575.00	460.00
03/05/20	JZ	Review of daily filings synopsis circulated by S. Siff for calendaring, docketing, further analysis, and assignment.	0.30	195.00	58.50
03/05/20	JZ	Finalize revision of adversary case analysis spreadsheet created by A. Castaldi to revise Defendants; circulate final excel sheet.	1.40	195.00	273.00
03/06/20	JA	Review research regarding FOMB debt reduction plan (.3); review correspondence regarding UTIER RFA (.1); review Minute Orders (.2)	0.60	575.00	345.00

PROMESA - Official Committee of Unsecured Creditors
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Invoice No. 98307

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03/06/20	JZ	Review of daily filings synopsis circulated by S. Siff for calendaring, docketing, further analysis, and assignment.	0.20	195.00	39.00
03/09/20	JZ	Review of internal report circulated by S. Siff.	0.30	195.00	58.50
03/10/20	JZ	Review of internal report circulated by S. Siff.	0.30	195.00	58.50
03/11/20	JZ	Review of internal report circulated by S. Siff.	0.30	195.00	58.50
03/12/20	JZ	Review of internal report circulated by S. Siff.	0.40	195.00	78.00
03/13/20	JZ	Review of internal report circulated by S. Siff.	0.30	195.00	58.50
03/16/20	JZ	Review of internal memo circulated by S. Siff.	0.20	195.00	39.00
03/17/20	JZ	Review of internal report circulated by S. Siff.	0.40	195.00	78.00
03/17/20	JZ	Review of Memo concerning Disclosure Statement, Confirmation and Related Scheduling and GJB Case Spreadsheet prepared by A. Castaldi.	0.40	195.00	78.00
03/18/20	JNS	Conference with J. Zamora regarding streamlining the calendaring in a more efficient manner by conducting daily morning meetings with S. Siff to discuss the prior days filings.	0.40	75.00	30.00
03/18/20	JZ	Review of internal report circulated by S. Siff.	0.30	195.00	58.50
03/18/20	JZ	Lengthy conference with J. Sardina regarding streamlining the calendaring in a more efficient manner by conducting daily morning meetings with S. Siff to discuss the prior days filings.	0.40	195.00	78.00
03/19/20	JZ	Review of internal report circulated by S. Siff.	0.40	195.00	78.00
03/20/20	JZ	Review of internal report circulated by S. Siff.	0.20	195.00	39.00
03/22/20	JZ	Receipt and review of FOMB's Statement re: requesting for the Court to adjourn consideration of the proposed Plan of Adjustment's disclosure hearing until further notice while city official's try to combat CV19; circulate statement.	0.30	195.00	58.50
03/23/20	JZ	Review of internal report circulated by S. Siff.	0.20	195.00	39.00
03/23/20	JZ	Attention to upcoming deadlines and calendaring.	0.20	195.00	39.00
03/24/20	JZ	Review of internal report circulated by S. Siff.	0.40	195.00	78.00

PROMESA - Official Committee of Unsecured Creditors
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03/25/20	JZ	Review of internal report circulated by S. Siff.	0.30	195.00	58.50
03/26/20	JZ	Review of internal report circulated by S. Siff.	0.40	195.00	78.00
03/27/20	JZ	Review of internal report circulated by S. Siff; conference regarding rescheduling of PREPA 9019 motions.	0.50	195.00	97.50
03/27/20	JZ	Commence reviewing each adversary case docket to ensure all filings have been reviewed and downloaded.	1.60	195.00	312.00
03/28/20	MGG	Review Motion and Order filed by Oversight Board for adjournment of Disclosure Hearing (.3). Analyze impact on litigation and other deadlines (.3).	0.60	575.00	345.00
03/30/20	JZ	Review of internal report circulated by S. Siff.	0.20	195.00	39.00
03/31/20	JZ	Review of internal report circulated by S. Siff.	0.40	195.00	78.00
Subtotal: B110 / Case Administration			14.10		\$3,461.50
B113 / Pleadings Review					
03/02/20	SS	Review and Analyze all court filings in the Main Case, Title III cases and Adversary Proceedings from late February 28 though March 1 in order to prepare digest of matters relevant to special litigation counsel and distribute to appropriate team members.	0.90	195.00	175.50
03/02/20	SS	Prepare digest of matters and filings from Late on February 28 through March 1 relevant to special litigation counsel and distribute to appropriate team members.	0.80	195.00	156.00
03/02/20	SS	Review and Analyze all court filings in the Main Case, Title III cases and Adversary Proceedings on March 2 in order to prepare digest of matters relevant to special litigation counsel and distribute to appropriate team members.	0.80	195.00	156.00
03/02/20	SS	Prepare digest of matters and filings on March 2 relevant to special litigation counsel and distribute to appropriate team members.	0.70	195.00	136.50
03/03/20	SS	Review and Analyze all court filings in the Main Case, Title III cases and Adversary Proceedings from late on March 2 in order to prepare digest of matters relevant to special litigation counsel and distribute to appropriate team members.	0.70	195.00	136.50
03/03/20	SS	Prepare digest of matters and filings from late on March 2 relevant to special litigation counsel and distribute to appropriate team members.	0.40	195.00	78.00
03/03/20	SS	Review and Analyze all court filings in the Main Case, Title III cases and Adversary Proceedings on March 3 in order to prepare digest of matters relevant to special litigation counsel and distribute to appropriate team members.	0.80	195.00	156.00

PROMESA - Official Committee of Unsecured Creditors
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03/03/20	SS	Prepare digest of matters and filings on March 3 relevant to special litigation counsel and distribute to appropriate team members.	0.70	195.00	136.50
03/04/20	SS	Review and Analyze all court filings in the Main Case, Title III cases and Adversary Proceedings from late on March 3 in order to prepare digest of matters relevant to special litigation counsel and distribute to appropriate team members.	0.90	195.00	175.50
03/04/20	SS	Prepare digest of matters and filings from late on March 3 relevant to special litigation counsel and distribute to appropriate team members.	0.40	195.00	78.00
03/04/20	SS	Review and Analyze all court filings in the Main Case, Title III cases and Adversary Proceedings on March 4 in order to prepare digest of matters relevant to special litigation counsel and distribute to appropriate team members.	0.60	195.00	117.00
03/04/20	SS	Prepare digest of matters and filings from late on March 3 relevant to special litigation counsel and distribute to appropriate team members.	0.60	195.00	117.00
03/04/20	SS	Prepare digest of matters and filings on March 4 relevant to special litigation counsel and distribute to appropriate team members.	0.40	195.00	78.00
03/05/20	SS	Prepare digest of matters and filings from late on March 4 relevant to special litigation counsel and distribute to appropriate team members.	0.60	195.00	117.00
03/05/20	SS	Review and Analyze all court filings in the Main Case, Title III cases and Adversary Proceedings on March 5 in order to prepare digest of matters relevant to special litigation counsel and distribute to appropriate team members.	0.60	195.00	117.00
03/05/20	SS	Prepare digest of matters and filings on March 5 relevant to special litigation counsel and distribute to appropriate team members.	0.30	195.00	58.50
03/05/20	SS	Review and Analyze all court filings in the Main Case, Title III cases and Adversary Proceedings from late March 4 in order to prepare digest of matters relevant to special litigation counsel and distribute to appropriate team members.	0.60	195.00	117.00
03/06/20	SS	Review and Analyze all court filings in the Main Case, Title III cases and Adversary Proceedings from late on March 5 in order to prepare digest of matters relevant to special litigation counsel and distribute to appropriate team members.	0.60	195.00	117.00
03/06/20	SS	Review and Analyze all court filings in the Main Case, Title III cases and Adversary Proceedings on March 6 in order to prepare digest of matters relevant to special litigation counsel and distribute to appropriate team members.	0.70	195.00	136.50
03/06/20	SS	Prepare digest of matters and filings on March 6 relevant to special litigation counsel and distribute to appropriate team members.	0.60	195.00	117.00

PROMESA - Official Committee of Unsecured Creditors
12272-001
Invoice No. 98307

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03/06/20	SS	Review and Analyze all court filings in the Main Case , Title III cases and Adversary Proceedings on March 6 in order to prepare digest of matters relevant to special litigation counsel and distribute to appropriate team members.	0.40	195.00	78.00
03/06/20	SS	Prepare digest of matters and filings from late on March 5 relevant to special litigation counsel and distribute to appropriate team members.	0.80	195.00	156.00
03/09/20	SS	Review and Analyze all court filings in the Main Case , Title III cases and Adversary Proceedings from late March 6 through March 8 in order to prepare digest of matters relevant to special litigation counsel and distribute to appropriate team members	0.90	195.00	175.50
03/09/20	SS	Prepare digest of matters and filings from late March 6 through March 8 relevant to special litigation counsel and distribute to appropriate team members	0.40	195.00	78.00
03/09/20	SS	Review and Analyze all court filings in the Main Case , Title III cases and Adversary Proceedings on March 9 in order to prepare digest of matters relevant to special litigation counsel and distribute to appropriate team members	0.60	195.00	117.00
03/09/20	SS	Prepare digest of matters and filings on March 9 relevant to special litigation counsel and distribute to appropriate team members	0.60	195.00	117.00
03/10/20	SS	Review and Analyze all court filings in the Main Case , Title III cases and Adversary Proceedings late on March 9 in order to prepare digest of matters relevant to special litigation counsel and distribute to appropriate team members	0.90	195.00	175.50
03/10/20	SS	Prepare digest of matters and filings from late March 9 relevant to special litigation counsel and distribute to appropriate team members	0.40	195.00	78.00
03/10/20	SS	Review and Analyze all court filings on March 10 in the Main Case, Title III cases in order to prepare digest of matters relevant to special litigation counsel and distribute to appropriate team members	0.80	195.00	156.00
03/10/20	SS	Prepare digest of matters and filings on March 10 relevant to special litigation counsel and distribute to appropriate team members	0.30	195.00	58.50
03/11/20	SS	Review and Analyze all court filings in the Main Case , Title III cases and Adversary Proceedings late on March 10 in order to prepare digest of matters relevant to special litigation counsel and distribute to appropriate team members	0.80	195.00	156.00
03/11/20	SS	Review and Analyze all court filings in the Main Case , Title III cases and Adversary Proceedings on March 11 in order to prepare digest of matters relevant to special litigation counsel and distribute to appropriate team members	0.80	195.00	156.00
03/11/20	SS	Prepare digest of matters and filings late on March 10 relevant to special litigation counsel and distribute to appropriate team members	0.30	195.00	58.50

PROMESA - Official Committee of Unsecured Creditors
12272-001
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03/11/20	SS	Prepare digest of matters and filings on March 11 relevant to special litigation counsel and distribute to appropriate team members	0.40	195.00	78.00
03/12/20	SS	Review and analyze orders modifying stays in order to determine current status of cases	0.80	195.00	156.00
03/12/20	SS	Review and Analyze all court filings in the Main Case, Title III cases and Adversary Proceedings on late March 11 in order to prepare digest of matters relevant to special litigation counsel and distribute to appropriate team members	0.80	195.00	156.00
03/12/20	SS	Review and Analyze all court filings in the Main Case, Title III cases and Adversary Proceedings from late on March 11 in order to prepare digest of matters relevant to special litigation counsel and distribute to appropriate team members	0.70	195.00	136.50
03/12/20	SS	Review and Analyze all court filings in the Main Case, Title III cases and Adversary Proceedings on March 12 in order to prepare digest of matters relevant to special litigation counsel and distribute to appropriate team members	0.80	195.00	156.00
03/12/20	SS	Prepare digest of matters and filings on March 12 relevant to special litigation counsel and distribute to appropriate team members	0.60	195.00	117.00
03/13/20	SS	Review and Analyze all court filings in the Main Case, Title III cases and Adversary Proceedings from late March 12 in order to prepare digest of matters relevant to special litigation counsel and distribute to appropriate team members	0.40	195.00	78.00
03/13/20	SS	Prepare digest of matters and filings form late March 12 relevant to special litigation counsel and distribute to appropriate team members	0.30	195.00	58.50
03/13/20	SS	Review and Analyze all court filings in the Main Case, Title III cases and Adversary Proceedings on March 13 in order to prepare digest of matters relevant to special litigation counsel and distribute to appropriate team members	0.70	195.00	136.50
03/13/20	SS	Prepare digest of matters and filings on March 13 relevant to special litigation counsel and distribute to appropriate team members	0.80	195.00	156.00
03/16/20	SS	Began draft of digest of matters and filings from late March 12 through March 15 relevant to special litigation counsel and distribute to appropriate team members.	0.40	195.00	78.00
03/16/20	SS	Review and Analyze all court filings in the Main Case, Title III cases and Adversary Proceedings on March 16 in order to prepare digest of matters relevant to special litigation counsel and distribute to appropriate team members.	0.70	195.00	136.50
03/16/20	SS	Review and Analyze all court filings in the Main Case, Title III cases and Adversary Proceedings from late March 12 through March 15 in order to prepare digest of matters relevant to special litigation counsel and distribute to appropriate team members.	1.20	195.00	234.00

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03/16/20	SS	Prepare digest of matters and filings on March 16 relevant to special litigation counsel and distribute to appropriate team members.	0.30	195.00	58.50
03/17/20	SS	Prepare digest of matters and filings from late on March 16 relevant to special litigation counsel and distribute to appropriate team members.	0.40	195.00	78.00
03/17/20	SS	Review and Analyze all court filings in the Main Case, Title III cases and Adversary Proceedings on March 17 in order to prepare digest of matters relevant to special litigation counsel and distribute to appropriate team members.	0.60	195.00	117.00
03/17/20	SS	Prepare digest of matters and filings on March 17 relevant to special litigation counsel and distribute to appropriate team members.	0.60	195.00	117.00
03/17/20	SS	Review and Analyze all court filings in the Main Case, Title III cases and Adversary Proceedings late on March 16 in order to prepare digest of matters relevant to special litigation counsel and distribute to appropriate team members.	0.90	195.00	175.50
03/17/20	SS	Review and Analyze Kobre and Kim database documents Batch SS2, Tranche 48 (34 documents)	1.10	195.00	214.50
03/18/20	SS	Review and Analyze all court filings in the Main Case, Title III cases and Adversary Proceedings from late on March 17 in order to prepare digest of matters relevant to special litigation counsel and distribute to appropriate team members.	0.60	195.00	117.00
03/18/20	SS	Prepare digest of matters and filings from late on March 17 relevant to special litigation counsel and distribute to appropriate team members.	0.40	195.00	78.00
03/18/20	SS	Review and Analyze all court filings in the Main Case, Title III cases and Adversary Proceedings on March 18 in order to prepare digest of matters relevant to special litigation counsel and distribute to appropriate team members.	0.90	195.00	175.50
03/18/20	SS	Prepare digest of matters and filings on March 18 relevant to special litigation counsel and distribute to appropriate team members.	0.40	195.00	78.00
03/19/20	SS	Review and Analyze all court filings in the Main Case, Title III cases and Adversary Proceedings from late March 18 in order to prepare digest of matters relevant to special litigation counsel and distribute to appropriate team members.	0.70	195.00	136.50
03/19/20	SS	Prepare digest of matters and filings from late March 18 relevant to special litigation counsel and distribute to appropriate team members.	0.40	195.00	78.00
03/19/20	SS	Review and Analyze all court filings in the Main Case, Title III cases and Adversary Proceedings on March 19 in order to prepare digest of matters relevant to special litigation counsel and distribute to appropriate team members.	0.80	195.00	156.00

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03/19/20	SS	Prepare digest of matters and filings on March 19 relevant to special litigation counsel and distribute to appropriate team members.	0.40	195.00	78.00
03/20/20	SS	Review and Analyze all court filings in the Main Case, Title III cases and Adversary Proceedings from late on March 19 in order to prepare digest of matters relevant to special litigation counsel and distribute to appropriate team members.	0.60	195.00	117.00
03/20/20	SS	Prepare digest of matters and filings from late on March 20 relevant to special litigation counsel and distribute to appropriate team members.	0.60	195.00	117.00
03/20/20	SS	Review and Analyze all court filings in the Main Case, Title III cases and Adversary Proceedings on March 20 in order to prepare digest of matters relevant to special litigation counsel and distribute to appropriate team members.	0.70	195.00	136.50
03/20/20	SS	Prepare digest of matters and filings on March 20 relevant to special litigation counsel and distribute to appropriate team members.	0.40	195.00	78.00
03/23/20	SS	Review and Analyze all court filings in the Main Case, Title III cases and Adversary Proceedings from late March 20 through March 22 in order to prepare digest of matters relevant to special litigation counsel and distribute to appropriate team members.	0.70	195.00	136.50
03/23/20	SS	Prepare digest of matters and filings from late on March 20 through March 22, relevant to special litigation counsel and distribute to appropriate team members.	0.30	195.00	58.50
03/23/20	SS	Review and Analyze all court filings in the Main Case, Title III cases and Adversary Proceedings on March 23 in order to prepare digest of matters relevant to special litigation counsel and distribute to appropriate team members.	0.80	195.00	156.00
03/23/20	SS	Prepare digest of matters and filings from March 23 relevant to special litigation counsel and distribute to appropriate team members.	0.60	195.00	117.00
03/24/20	SS	Review and Analyze all court filings in the Main Case, Title III cases and Adversary Proceedings from late on March 23 in order to prepare digest of matters relevant to special litigation counsel and distribute to appropriate team members.	0.70	195.00	136.50
03/24/20	SS	Prepare digest of matters and filings late on March 23 relevant to special litigation counsel and distribute to appropriate team members.	0.60	195.00	117.00
03/24/20	SS	Review and Analyze all court filings in the Main Case, Title III cases and Adversary Proceedings on March 24 in order to prepare digest of matters relevant to special litigation counsel and distribute to appropriate team members.	0.80	195.00	156.00
03/24/20	SS	Prepare digest of matters and filings on March 24 relevant to special litigation counsel and distribute to appropriate team members.	0.60	195.00	117.00

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03/25/20	SS	Review and Analyze all court filings in the Main Case , Title III cases and Adversary Proceedings from late March 24 in order to prepare digest of matters relevant to special litigation counsel and distribute to appropriate team members.	0.80	195.00	156.00
03/25/20	SS	Prepare digest of matters and filings from late on March 24 relevant to special litigation counsel and distribute to appropriate team members.	0.40	195.00	78.00
03/25/20	SS	Review and Analyze all court filings in the Main Case , Title III cases and Adversary Proceedings on March 25 in order to prepare digest of matters relevant to special litigation counsel and distribute to appropriate team members.	1.30	195.00	253.50
03/25/20	SS	Prepare digest of matters and filings on March 25 relevant to special litigation counsel and distribute to appropriate team members.	0.40	195.00	78.00
03/26/20	SS	Review and Analyze all court filings in the Main Case , Title III cases and Adversary Proceedings from late on March 25 in order to prepare digest of matters relevant to special litigation counsel and distribute to appropriate team members.	0.70	195.00	136.50
03/26/20	SS	Prepare digest of matters and filings from late on March 25 relevant to special litigation counsel and distribute to appropriate team members.	0.40	195.00	78.00
03/26/20	SS	Review and Analyze all court filings in the Main Case , Title III cases and Adversary Proceedings on March 26 in order to prepare digest of matters relevant to special litigation counsel and distribute to appropriate team members.	1.20	195.00	234.00
03/26/20	SS	Prepare digest of matters and filings on March 26 relevant to special litigation counsel and distribute to appropriate team members.	0.40	195.00	78.00
03/26/20	SS	Review and Analyze database documents produced by Kobre and Klm, Batch SS2, Tranche 51 (14 documents)	0.60	195.00	117.00
03/27/20	SS	Review and Analyze all court filings in the Main Case , Title III cases and Adversary Proceedings from late on March 26 in order to prepare digest of matters relevant to special litigation counsel and distribute to appropriate team members.	0.80	195.00	156.00
03/27/20	SS	Prepare digest of matters and filings from late on March 26 relevant to special litigation counsel and distribute to appropriate team members.	0.60	195.00	117.00
03/27/20	SS	Review and Analyze all court filings in the Main Case , Title III cases and Adversary Proceedings on March 27 in order to prepare digest of matters relevant to special litigation counsel and distribute to appropriate team members.	1.20	195.00	234.00
03/27/20	SS	Prepare digest of matters and filings on March 27 relevant to special litigation counsel and distribute to appropriate team members. Distribute to appropriate team members filings related to adjournments because of the Coronavirus,	0.70	195.00	136.50

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03/30/20	SS	Review and Analyze all court filings in the Main Case, Title III cases and Adversary Proceedings from late March 27 through March 29 in order to prepare digest of matters relevant to special litigation counsel and distribute to appropriate team members.	0.80	195.00	156.00
03/30/20	SS	Prepare digest of matters and filings from late amrch 27 through March 29 relevant to special litigation counsel and distribute to appropriate team members.	0.30	195.00	58.50
03/30/20	SS	Review and Analyze all court filings on March 30 in the Main Case, Title III cases and Adversary Proceedings in order to prepare digest of matters relevant to special litigation counsel and distribute to appropriate team members .Continuously checked dockets for particularly significant filings to be circulated immediately.	0.70	195.00	136.50
03/30/20	SS	Review and Analyze all court filings in the Main Case, Title III cases and Adversary Proceedings on March 30 in order to prepare digest of matters relevant to special litigation counsel and distribute to appropriate team members.	0.30	195.00	58.50
03/31/20	SS	Review and Analyze all court filings in the Main Case, Title III cases and Adversary Proceedings from late on March 30 in order to prepare digest of matters relevant to special litigation counsel and distribute to appropriate team members.	0.80	195.00	156.00
03/31/20	SS	Prepare digest of matters and filings from late March 30 relevant to special litigation counsel and distribute to appropriate team members.	0.30	195.00	58.50
03/31/20	SS	Review and Analyze all court filings in the Main Case, Title III cases and Adversary Proceedings on March 31 in order to prepare digest of matters relevant to special litigation counsel and distribute to appropriate team members. Continuously searched dockets for significant filings needing immediate circulation.	0.80	195.00	156.00
03/31/20	SS	Prepare digest of matters and filings on March 31 relevant to special litigation counsel and distribute to appropriate team members.	0.60	195.00	117.00
Subtotal: B113 / Pleadings Review			59.30		\$11,563.50
B150 / Meetings of Creditors					
03/02/20	JA	Confer with Committee chair, A. Velazquez, regarding case issues.	0.20	575.00	115.00
03/06/20	JA	Attend Committee meeting (.7); confer with L. Despins regarding Committee presentation (.2)	0.90	575.00	517.50
03/11/20	JA	Committee call regarding case status, litigation strategy, and proposed claims.	0.60	575.00	345.00
03/13/20	JA	Confer with committee chair regarding status of research and analysis.	0.40	575.00	230.00

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03/18/20	JA	Confer with Committee regarding case issues and strategy (.7); confer with Clair regarding fee statements (.2)	0.90	575.00	517.50
03/25/20	JA	Committee call regarding case status, litigation strategy, and potential claims.	1.40	575.00	805.00
03/26/20	JA	Committee call regarding pending issues.	0.70	575.00	402.50
03/31/20	JA	Confer with Committee regarding case issues and options, on interim basis, concerning potential claims.	1.00	575.00	575.00
Subtotal: B150 / Meetings of Creditors			6.10		\$3,507.50
B160 / Fee/Employment Applications					
03/02/20	MGG	Review and serve November and December 2019 Monthly Fee Statements with Attachments.	0.60	575.00	345.00
03/02/20	CE	Revise and finalize November and December Declarations (Exhibit B to Monthly Fee Statements) per K. Forrest; Finalize November and December Monthly Fee Statements; E-mail correspondence with M. Guitian re: same.	0.80	150.00	120.00
03/02/20	CBH	Attention to e-mail correspondence regarding January 2020 invoice and finalization for preparation of 3rd Interim Fee Application.	0.50	195.00	97.50
03/03/20	JA	Revise fee statements to conform with Fee Examiner requirements.	1.20	575.00	690.00
03/03/20	CBH	Continue preparation of third interim fee application; edits to exhibits to include fee invoices for November and December 2019.	0.50	195.00	97.50
03/04/20	JA	Review and prepare fee statements.	1.20	575.00	690.00
03/05/20	JA	Continued review and revision of of fee statements in conformity with Fee Examiner guidelines	0.60	575.00	345.00
03/06/20	MGG	Review invoices, and recap of January invoices.	0.40	575.00	230.00
03/09/20	MGG	Review Omnibus Order Awarding and Deferring Fee Applications Doc No. 12157.	0.20	575.00	115.00
03/09/20	MGG	Confer with C. Hopkins re: Interim Fee Applications and internal reports (.30). Review internal reports sent by Ken Forrest (.40).	0.70	575.00	402.50
03/09/20	CBH	Continue preparation of fee application (.8); attention to preparation of various exhibits, declaration and order (2.8)	3.60	195.00	702.00
03/10/20	JA	Revise Fee Statements in confirmity with Examiner guidelines.	1.30	575.00	747.50
03/10/20	CBH	Continue preparation of third interim fee application (1.4); updates to exhibits and review of January 2020 invoice (.8)	2.20	195.00	429.00

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03/11/20	CBH	Continue preparation of third interim fee application (.6); attention to preparation of exhibits and summary (.4); attention and analyze bill and payment report; complete exhibit (.6); begin preparation of case background (.2).	1.80	195.00	351.00
03/12/20	MGG	Review fee statements for January 2020 (.40). Prepare and serve email to Committee requesting approval (.30).	0.70	575.00	402.50
03/12/20	MGG	Confer with C. Hopkins re: Draft Fee Application and breakdown of amounts due and paid. (.30). Review accounting reports (.50).	0.80	575.00	460.00
03/12/20	CBH	Continue preparation of fee application (.8); edits to exhibits (.6).	1.40	195.00	273.00
03/13/20	MGG	Review and comment of draft Third Interim Fee Application.	0.60	575.00	345.00
03/15/20	MGG	Continue review and revisions to draft copy of Third Interim Fee Application.	1.30	575.00	747.50
03/16/20	JA	Confer with Mariaelena Guitian regarding interim fee application.	0.20	575.00	115.00
03/16/20	MGG	Review, revise and amend descriptions for each task (.6). Review and verify amounts sought under the Applications (.4). Review and finalize Third Interim Fee Application (.6).	1.60	575.00	920.00
03/16/20	CBH	Final edits to fee application; addition of billing descriptions and language; meeting with M. Guitian regarding same (.4); final preparation and filing fee application (.6); multiple edits to billing language, detailed review of invoices; filing of fee application and notice of appearance (1.2).	2.20	195.00	429.00
03/17/20	MGG	Service of GJB Monthly Fee Objection Letter for November and December.	0.20	575.00	115.00
03/17/20	JZ	Receipt and review of GJB's Third Interim Fee Application and Notice of Hearing on same (.3); calendar hearing date and objection deadline (.1); conference with J. Sardina regarding service (.2); retrieve latest mailing matrix (.1); serve applicable parties via mail and commence service of parties via e-mail (.7); update electronic case profile (.1)	1.40	195.00	273.00
03/18/20	JZ	Continue electronic service, via e-mail of GJB's Third Interim Fee Application and Notice of Hearing upon the 85 page matrix.	1.00	195.00	195.00
03/18/20	CE	Prepare, finalize and serve Monthly Fee Objection Letter (November); e-mail correspondence with M. Guitian re: same.	0.60	150.00	90.00
03/18/20	CE	Prepare, finalize and serve Monthly Fee Objection Letter (December); e-mail correspondence with M. Guitian re: same.	0.60	150.00	90.00
03/19/20	JZ	Continue electronic service, via e-mail of GJB's Third Interim Fee Application and Notice of Hearing upon the 85 page matrix; draft and file Certificate of Service once finalize.	0.80	195.00	156.00

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03/30/20	MGG	Review email from John Genovese and Memorandum of Retained Professionals on COVID and Updated Schedule.	0.40	575.00	230.00
03/30/20	MGG	Emails to and from Carolyn Esser re: service of GJB Monthly Fee Statement for January with exhibits. Review and approve.	0.30	575.00	172.50
03/30/20	CE	Preparation of January Monthly Fee Statement.	1.10	150.00	165.00
03/31/20	MGG	Confer with C. Hopkins re: Memorandum of Retained Professionals on COVID and Updated Schedule and scheduling of new deadlines.	0.40	575.00	230.00
Subtotal: B160 / Fee/Employment Applications			31.20		\$10,770.50
B161 / Budgeting					
03/11/20	MGG	Confer with John Arrastia re: April Budget.	0.20	575.00	115.00
03/12/20	JHG	Review email from J. Arrastia and proposed budget.	0.80	765.00	612.00
03/12/20	JA	Prepare preliminary April Budget	0.80	575.00	460.00
03/16/20	MGG	Review Budget descriptions (.40). Revise April Budget (.40).	0.80	575.00	460.00
03/17/20	JA	Prepare budget and revise budget to update status of cases.	1.10	575.00	632.50
03/17/20	MGG	Review e-mail re: extension for submission of April Budget.	0.10	575.00	57.50
03/17/20	MGG	Email to and from John Arrastia re: adjustments and revisions to April Budget.	0.30	575.00	172.50
03/23/20	JA	Revise Budget.	0.20	575.00	115.00
03/23/20	MGG	Review and analyze revised PH Budget for April 2020.	0.30	575.00	172.50
03/28/20	MGG	Confirm extension of submission of April's Budget to Wednesday April 1st. (.10). Review draft version of April's Budget (.20).	0.30	575.00	172.50
03/30/20	JA	Review correspondence from Fee Examiner.	0.10	575.00	57.50
03/31/20	JA	Confer with client and revise proposed budget.	0.30	575.00	172.50
Subtotal: B161 / Budgeting			5.30		\$3,199.50
B165 / Fee-Employment Other Professionals					

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03/30/20	MGG	Review and respond to request by Jose Cartaya re: approval of interim fees by Committee.	0.30	575.00	172.50
03/31/20	MGG	Email to and from Jose Cartaya re: approval by Committee of November and December statements.	0.20	575.00	115.00
Subtotal: B165 / Fee-Employment Other Professionals			0.50		\$287.50
B190 / Other Contested Matters					
03/05/20	JA	Review Motion to Extend Deadlines and Establish Litigation Case Management	0.60	575.00	345.00
03/13/20	JA	Review Opposition to UCC 2019 Motion (.3); Reveiw Amended Cross Motion ISO UCC regarding Disclosure 2019 (1.8)	2.10	575.00	1,207.50
Subtotal: B190 / Other Contested Matters			2.70		\$1,552.50
B191 / General Litigation					
03/01/20	MAF	Review of lengthy (100+ page) memorandum decision from Delaware bankruptcy court analyzing [REDACTED] [REDACTED] [REDACTED] analyzing potential application in PROMESA context (3.4).	3.40	550.00	1,870.00
03/01/20	JA	Review and analyze legal research and memorandum from A. Castaldi regarding [REDACTED]	1.70	575.00	977.50
03/01/20	AMC	Conduct substantial research of case law and other secondary sources law concerning [REDACTED] [REDACTED]	3.20	375.00	1,200.00
03/01/20	AMC	Conduct substantial research concerning [REDACTED] [REDACTED]	4.30	375.00	1,612.50
03/02/20	JHG	Review emails and preliminary analysis of research on [REDACTED] [REDACTED]	4.60	765.00	3,519.00
03/02/20	JA	Strategize with J. Genovese regarding [REDACTED] issues relating to potential litigation (.4); confer and strategize with A. Castadi regarding potential litigation (.4); confer and strategize with M. Friedman (.2); develop litigation strategy regarding [REDACTED] issues (1.2); legal research and analysis regarding same (.7)	2.90	575.00	1,667.50
03/02/20	JA	Review hearing agenda for Omnibus.	0.30	575.00	172.50
03/02/20	MGG	Review Order approving entry of Eleventh Amended Notice, Case Management and Administrative Procedures and impact on pending litigation (.40). Consider new deadlines imposed (.20).	0.60	575.00	345.00

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03/02/20	ALG	Review Financial related documents provided by Kobre Kim report related to financial target claims and further identified as ALG Batch 7 (docs 462-513) (1.3); Review financial related documents provided by Kobre Kim Report related to financial target claims and further identified as ALG Batch 7 (Docs 514-614) (1.4)	2.70	565.00	1,525.50
03/02/20	AMC	Conduct substantial research concerning [REDACTED] [REDACTED]	3.90	375.00	1,462.50
03/02/20	AMC	Began preparation of research memorandum analyzing and evaluating [REDACTED] [REDACTED]	1.40	375.00	525.00
03/02/20	JZ	Receipt and review of Plaintiffs' Motion for Leave to File Second Amended Complaint[ECF No. 11952]; calendar response deadline; circulate same; update electronic case profile.	0.20	195.00	39.00
03/02/20	JZ	Receipt and review of Debtors Motion for an order (i) approving the proposed Disclosure Statement (as defined below), (ii) fixing a Voting Record Date (as defined below) for voting to accept or reject the Plan , (iii) approving the Confirmation Hearing Notice and confirmation schedule, (iv) approving the proposed contents of the Solicitation Package (as defined below) and procedures for distribution thereof, (v) approving the forms of ballots and notices, and establishing solicitation, voting, distribution election, and balloting procedures, (vi) approving the form and manner of Notice of Non-Voting Status, (vii) fixing the Voting Deadline and Election Deadline and (viii) approving procedures for tabulating creditor votes calendar response deadline and hearing date; circulate same; update electronic case profile.	0.50	195.00	97.50
03/03/20	JHG	Review notice of agenda for March 4-5, 2020 hearings and related pleadings.	0.60	765.00	459.00
03/03/20	JHG	Review summary from S. Siff to identify and analyze strategic litigation issues and deadlines.	0.70	765.00	535.50
03/03/20	JHG	Review ECF 11956, FOMB's motion establishing procedures and deadlines.	0.40	765.00	306.00
03/03/20	JHG	Review ECF 11958, in support of motion to compel.	0.50	765.00	382.50
03/03/20	JHG	Review ECF 11969, Court order and deadlines.	0.40	765.00	306.00
03/03/20	JHG	Review ECF 11989, UCC notice of hearing and motion regarding 3013.	0.70	765.00	535.50

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03/03/20	JA	Review draft Motion to Extend Deadlines as to vendor litigation (.3); confer with N. Bassett (.1); review correspondence to Brown Rudnick regarding draft motion (.1); review and revise correspondence by Committee (.3); review adversary proceedings and chart (1.3); review Order on Intervention (.2); review and analyze overview of GO Bond recoveries(.8)	3.10	575.00	1,782.50
03/03/20	JA	Legal research and analysis [REDACTED] [REDACTED]	1.30	575.00	747.50
03/03/20	ALG	Review Financial related documents provided by Kobre Kim report related to financial target claims and further identified as ALG Batch 7 (docs 615-703) (1.8); Review financial related documents provided by Kobre Kim Report related to financial target claims and further identified as ALG Batch 7 (docs 704-764) (1.3)	3.10	565.00	1,751.50
03/03/20	AMC	Continued preparation of research memorandum analyzing and evaluating [REDACTED] [REDACTED]	6.60	375.00	2,475.00
03/03/20	JZ	Receipt and review of UCC's Motion for Entry of an Order Reclassifying Class 39A and Class 41 Claims Under Oversight Board's Plan of Adjustment; circulate same; calendar hearing date and objection deadline; update electronic case profile.	0.40	195.00	78.00
03/03/20	JZ	Review of adversary case analysis spreadsheet created by A. Castaldi; review each case docket; commence revision to same to include additional defendants added to each adversaries via amended complaints; highlight all Defendants dismissed via Notice.	2.30	195.00	448.50
03/03/20	SS	Review and Analyze database documents produced by Kobre and Kim, Batch SS2, Tranche 43 (21 documents)	1.10	195.00	214.50
03/04/20	JHG	Review daily summary provided by S. Siff to identify and analyze strategic litigation issues.	0.40	765.00	306.00
03/04/20	JHG	Review ECF 12001, informative motion regarding status report.	0.40	765.00	306.00
03/04/20	JHG	Review ECF 12005, Magistrate Order and analysis of open issues.	1.10	765.00	841.50
03/04/20	JHG	Review issues regarding disclosure statement objection and strategize to objections based on PSA creditors bad conduct and other issues.	1.40	765.00	1,071.00
03/04/20	JA	Telephonically attended Omnibus Hearing.	6.30	575.00	3,622.50
03/04/20	ALG	Review financial related documents provided by Kobre Kim Report related to financial target claims and further identified as ALG Batch 7 (Docs 765-840) (2.1)	2.10	565.00	1,186.50

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03/04/20	JZ	Receipt and review of Minute Order reflecting the Court's rulings on the first day of the Omnibus hearing; circulate same; update electronic case profile.	0.30	195.00	58.50
03/04/20	SS	Review and Analyze database documents produced by Kobre and Kim, Batch SS2, Tranche 44 (16 documents)	0.60	195.00	117.00
03/05/20	JHG	Review email from S. Siff forwarding filings.	0.10	765.00	76.50
03/05/20	JHG	Review AMBAC's informative motion regarding amended lift stay.	0.40	765.00	306.00
03/05/20	JHG	Review ECF 12002, order regarding deadline to lift stay orders.	0.30	765.00	229.50
03/05/20	JA	Telephonic attendance at Omnibus hearing.	1.70	575.00	977.50
03/05/20	JA	Confer and strategize with Angelo Castaldi regarding Adversary Motions to Dismiss relating to GO liens (.4); review Minute Order (.2); review draft Motion to Extend Deadlines (.1); review UTIER and SREAEE RFA Responses and Exhibit List (.3); review AFT Objection (.1)	1.10	575.00	632.50
03/05/20	ALG	Review financial related documents provided by Kobre Kim Report related to financial target claims and further identified as ALG Batch 7 (Docs 841 - 880) (1.4).	3.70	565.00	2,090.50
		Review financial related documents provided by Kobre Kim Report related to financial target claims and further identified as ALG Batch 7 (Docs 881 - 1025) (2.3).			
03/05/20	SS	Reviewed and Analyzed database documents produced by Kobre and Kim, Batch SS2, Tranche 45, (38 documents)	1.40	195.00	273.00
03/06/20	JHG	Review daily summary prepared by S. Siff to identify and analyze strategic litigation issues.	0.40	765.00	306.00
03/06/20	JHG	Review ECF 12084, objection to UCC's motion.	0.60	765.00	459.00
03/06/20	JHG	Review ECF 17-03283, second omnibus motion to extend deadlines.	1.50	765.00	1,147.50
03/06/20	JHG	Review Prime Clerk service of objections, 12125, 12126, 12138, 12140, 12141, 12143, 12144 to determine whether GJB litigation cases affected indirectly and review strategy in other matters as applicable to GJB cases.	1.10	765.00	841.50
03/06/20	ALG	Review financial related documents provided by Kobre Kim Report related to financial target claims and further identified as ALG Batch 7 (Docs 1026 - 1086) (1.9).	1.90	565.00	1,073.50
03/06/20	JZ	Receipt and review of the Order Overruling Omnibus Objection to Fee Applications Filed by Professionals and Request to Increase Holdback Amount filed by Cobra Acquisitions; circulate same; update electronic case profile.	0.20	195.00	39.00

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03/06/20	JZ	Receipt and review of Minute Order reflecting the Court's rulings on the second day of the Omnibus hearing; circulate same; update electronic case profile.	0.30	195.00	58.50
03/06/20	JZ	Receipt and review of Second Omnibus Motion To Extend Deadlines In Order Granting Omnibus Motion By The SCC and the UCC TO (I) Establish Litigation Case Management Procedures and (II) Establish Procedures For Approval Of Settlements; circulate same; update electronic case profile.	0.30	195.00	58.50
03/09/20	JHG	Review daily summary provided by S. Siff to identify and analyze (.4); review and analyze ECF 12216, UCC motion and cross-motion to amend case management order (.5).	0.90	765.00	688.50
03/09/20	JHG	Review and analysis of ECF 12217, UCC response to Ad Hoc Groups opposition.	0.40	765.00	306.00
03/09/20	JHG	Review ECF 12219, urgent motion regarding briefing.	0.30	765.00	229.50
03/09/20	JHG	Review ECF 1220, debtor motion regarding deadlines.	0.40	765.00	306.00
03/09/20	JHG	Review ECF 12221, cross motion and statement.	0.50	765.00	382.50
03/09/20	JA	Review reservation of rights (.1); review Solicitation Order (.1)	0.20	575.00	115.00
03/09/20	MAF	Further legal research and analysis regarding [REDACTED] [REDACTED] (2.7).	2.70	550.00	1,485.00
03/09/20	ALG	Review financial related documents provided by Kobre Kim Report related to financial target claims and further identified as ALG Batch 7 (Docs 765-840) (2.1)	0.90	565.00	508.50
03/09/20	AMC	Continue research of bankruptcy authorities concerning [REDACTED]	0.90	375.00	337.50
03/09/20	AMC	Complete exhaustive memorandum of law concerning various issues under [REDACTED] [REDACTED]	4.70	375.00	1,762.50
03/09/20	SS	Review and analyze database documents produced by Kobre and Kim, Batch SS2, Tranche 46 (16 documents)	0.80	195.00	156.00
03/10/20	JHG	Review final case management order (ECF 12186) and coordinate deadline.	1.10	765.00	841.50
03/10/20	JHG	Review email daily summary from S. Siff to identify and analyze strategic litigation issues.	0.40	765.00	306.00
03/10/20	JHG	Review disclosure statement deadlines.	1.30	765.00	994.50

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03/10/20	JA	Review various Final Case Management Orders and analyze same (.6); review revised Pre-solicitation Order (1.8); review Response to 2019 Motion (.4); review Cross Motion ISO UCC (1.2); review Motion to Establish Deadlines (.2); strategize regarding 2019 issues (.6); review Mediation Agreement (.5); Review Various Minute Order re Stay in Adversary Proceedings (.3)	5.60	575.00	3,220.00
03/10/20	ALG	Review financial related documents provided by Kobre Kim Report related to financial target claims and further identified as ALG Batch 7 (Docs 1142 - 1200) (1.3).	2.40	565.00	1,356.00
		Review financial related documents provided by Kobre Kim Report related to financial target claims and further identified as ALG Batch 7 (Docs 1201 - 1261) (1.1).			
03/10/20	AMC	Continued review and analysis of the Disclosure Statement filed by the Oversight Board on February 28, 2020.	5.60	375.00	2,100.00
03/10/20	AMC	Review of salient orders of the Court concerning upcoming deadlines, mediation procedures, and scheduling vis-à-vis matters handled by the Firm.	1.30	375.00	487.50
03/10/20	JZ	Receipt and review of Order scheduling a Disclosure Statement Hearing to consider the adequacy of the information contained in the Amended Disclosure Statement; calendar deadlines and hearing date; circulate same; update electronic case profile.	0.50	195.00	97.50
03/10/20	JZ	Receipt and review of Final Stay Order entered in ADV Cases 19-280, 19-281, 19-282, 19-283, 19-288 and 19-364; circulate same; update each electronic case profiles.	0.60	195.00	117.00
03/10/20	SS	Review and analyze database documents produced by Kobre and Kim, Batch SS2, Tranch 47 (25 documents).	1.10	195.00	214.50
03/11/20	JHG	Review daily summary from S. Siff to identify and analyze strategic litigation issues; review ECF 12189, final order regarding stay period and mandatory mediation.	0.40	765.00	306.00
03/11/20	JHG	Review GDB debt recovery authority analysis.	0.60	765.00	459.00
03/11/20	JHG	Analysis of email from Alex Bongartz and update on status of 2019 motion and analysis.	0.90	765.00	688.50
03/11/20	JHG	Review and analysis of ECF 12216, cross motion regarding bond disclosures.	0.80	765.00	612.00
03/11/20	JMS	Review analysis of proposed amended plan and continued review of impact on litigation.	1.80	500.00	900.00
03/11/20	ALG	Review financial related documents provided by Kobre Kim Report related to financial target claims and further identified as ALG Batch 7 (Docs 1333 -1352) (1.3).	2.70	565.00	1,525.50
		Review financial related documents provided by Kobre Kim Report related to financial target claims and further identified as ALG Batch 7 (Docs 1352 - 1412) (1.4).			

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03/11/20	AMC	Review AMBAC motion concerning Rule 2019 and insider trading issues.	0.60	375.00	225.00
03/12/20	ALG	Review financial related documents provided by Kobre Kim Report related to financial target claims and further identified as ALG Batch 7 (Docs 1413 -1423) (.6).	1.20	565.00	678.00
		Review financial related documents provided by Kobre Kim Report related to financial target claims and further identified as ALG Batch 7 (Docs 1424 - 1459) (.6).			
03/12/20	JZ	Receipt and review of Final Stay Order entered in ADV 19-297; circulate same; update electronic case profile.	0.30	195.00	58.50
03/13/20	JHG	Review email from Prime Clerk; review ECF 12186 and related 7176, 10102, 10104, 10109, 10591 and 10595 regarding final case management order from Revenue Bond hearings.	1.40	765.00	1,071.00
03/13/20	JHG	Review and analyze ECF 12189 and 13 related ECF documents regarding stay and mandatory mediation issues.	2.30	765.00	1,759.50
03/13/20	JMS	Attention to issues arising from 2019 motion and potential development of litigation (2.4) attention to AMBAC statement of clarification (.3)	2.70	500.00	1,350.00
03/16/20	JHG	Review daily summary provided by S. Siff to identify and analyze strategic litigation issues.	0.40	765.00	306.00
03/16/20	JHG	Review ECF 12257, Commonwealth response regarding administrative reconciliation of claims.	0.30	765.00	229.50
03/16/20	JHG	Review ECF 12261, informative motion regarding production and exhibits.	0.40	765.00	306.00
03/16/20	JHG	Review ECF 12263 joint status report regarding DRA Parties motion and memorandum of law.	0.60	765.00	459.00
03/16/20	JHG	Review status of deadlines regarding disclosure statement, review email from Alex Bongartz.	0.30	765.00	229.50
03/16/20	MGG	Review pending litigation spreadsheet (.40) and emails to and from Angelo Castaldi regarding summary of cases handled by GJB (.50).	0.90	575.00	517.50
03/16/20	JA	Review and analyze memorandum regarding legal research relating to [REDACTED] (2.3); review various orders to extend deadlines (.3); review Motion for Relief and Reconsideration ECF 12386 (.6); review Motion for Relief fro Stay Order (.1)	3.30	575.00	1,897.50
03/16/20	JMS	Review Monolines Amended 2019 Motion and other materials in support of claim development.	1.20	500.00	600.00
03/16/20	AMC	Revised research memorandum concerning [REDACTED] [REDACTED]	2.60	375.00	975.00

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03/16/20	AMC	Review and analyze: (A) Court's Order establishing deadlines concerning the disclosure statement and objections thereto; (B) Court's order on the Mediation team's report and recommendation; (C) Ambac Assurance Corporation, Financial Guaranty Insurance Company, Assured Guaranty Corp., Assured Guaranty Municipal Corp., and the Bank of New York Mellon's Motion Concerning Rule 2019 requirements.	1.30	375.00	487.50
03/16/20	JZ	Receipt and review of Ad Hoc Group of General Obligation Bondholders Motion to Modify Briefing Schedule [ECF No. 12407]; circulate same; update electronic case profile.	0.30	195.00	58.50
03/16/20	JZ	Receipt and review of Order re: Second Omnibus Motion to Extend Deadlines to Establish Case Management Procedures and Establish Procedures for Approval of Settlements filed in ADV. 19-276, 19-277, 19-279; calendar deadline to respond; circulate same; update each electronic case profile.	0.50	195.00	97.50
03/16/20	JNS	Attention to e-mails circulated by Steve Siff regarding deadline	0.20	75.00	15.00
03/17/20	JHG	Review and analyze email from M. Gayo-Guitian outlining adversary proceedings GJB is involved in.	0.80	765.00	612.00
03/17/20	JA	Review Reply in Support of Rule 2019 (.4); review Joint Motion for Entry of Schedule for ERS Bondholder Claims (.1); review Memorandum on Disclosure Statement, Plan, and related deadlines (.4)	0.90	575.00	517.50
03/17/20	AMC	Attend to preparation of internal memorandum concerning recent Court orders (and notices) that impact scheduling and deadlines in cases handled by the Firm.	3.40	375.00	1,275.00
03/17/20	JZ	Receipt of e-mail from C. Tarrant attaching the Spanish translated Final Stay Order in ADV 19-297; prepare service package and coordinate service of order in English and Spanish with PrimeClerk; update electronic case profile.	0.50	195.00	97.50
03/17/20	JZ	Receipt and review of Order Granting Motion to Modify Briefing Schedule [ECF No. 12422]; circulate same; calendar deadlines; conference with A. Castaldi regarding our role in this matter; update electronic case profile.	0.50	195.00	97.50
03/18/20	JHG	Extensive review of research memorandum [REDACTED] [REDACTED]	3.40	765.00	2,601.00
03/18/20	JHG	Review additional case law regarding [REDACTED] [REDACTED] (1.4); strategize with J. Arrastia (1.3)	2.70	765.00	2,065.50
03/18/20	MGG	Review, study and discuss Memorandum from Angela Castaldi re: Scheduling Orders and Deadlines.	0.40	575.00	230.00
03/18/20	JA	Confer and strategize with John Genovese regarding [REDACTED] [REDACTED] strategy, disclosure statement, and confirmation	1.30	575.00	747.50

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03/18/20	JA	Revise memorandum regarding claims for external distribution.	0.40	575.00	230.00
03/18/20	JMS	Continued review and analysis of [REDACTED] [REDACTED]	2.20	500.00	1,100.00
03/18/20	AMC	Continued preparation of, and finalize, internal memorandum analyzing various orders of the Court, their antecedents, and their impact on current pending litigations.	3.20	375.00	1,200.00
03/18/20	JNS	Email service of third Interim fee Application [CP 12409] and Notice of Hearing [CP 12410]	1.20	75.00	90.00
03/18/20	SS	Review and Analyze database documents produced by Kobre and Kim, Batch SS2, Tranche 49 (26 documents)	1.00	195.00	195.00
03/19/20	JHG	Review daily summary from S. Siff to identify and analyze strategic litigation issues.	0.70	765.00	535.50
03/19/20	JHG	Review and analyze (ECF 12296) amended cross motion supporting UCC motion to amend tenth case management regarding additional disclosures.	1.60	765.00	1,224.00
03/19/20	JA	Confer and strategize with Angelo Castaldi regarding additional legal research and analysis [REDACTED] [REDACTED].	0.40	575.00	230.00
03/19/20	JMS	Review issues concerning Gracia-Gracia plaintiffs and attention to potential implication in other litigation matters.	1.40	500.00	700.00
03/19/20	AMC	Research bankruptcy authorities concerning [REDACTED] [REDACTED]	1.90	375.00	712.50
03/20/20	JHG	Review daily summary from S. Siff to identify and analyze strategic litigation issues.	0.30	765.00	229.50
03/20/20	JHG	Review (ECF 12462) joint motion for discovery and briefing and proposed order.	0.60	765.00	459.00
03/20/20	JMS	Review QTCB/LCTB disclosures and analyze structure of potential discovery (1.7), research into [REDACTED] [REDACTED] (1.9)	3.60	500.00	1,800.00
03/20/20	JPB	Reviewed Kobre and Kim database documents in Batch JP6, Tranche 1 (21 documents).	1.20	375.00	450.00
03/20/20	JPB	Reviewed Kobre and Kim database documents in Batch JP6, Tranche 2 (84 documents).	1.90	375.00	712.50
03/20/20	AMC	Draft memorandum analyzing plan releases to so-called released parties, and cross-reference released parties with parties to existing adversary proceedings.	4.20	375.00	1,575.00
03/20/20	JZ	Assist A. Castaldi in task concerning plan releases; review excel sheets to analyze if one or more of the entities may be a pseudonym defendant in various litigations that have used pseudonyms in lieu of formal names in the caption; draft memo with findings.	5.90	195.00	1,150.50

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03/20/20	TG	Prepare communication to Trustpoint re: Login issues for J. P. Bado	0.10	120.00	12.00
03/22/20	JA	Review FOMB statement on COVID-19 (.1); review and analyze Notice of Removal by Monoline regarding strategy (1.6)	1.70	575.00	977.50
03/23/20	JHG	Review emails and analyze issues raised by Monolines notice of removal and exhibits.	3.70	765.00	2,830.50
03/23/20	JHG	Review email from Alex Bongartz and review issues regarding limited joinder in FOMB's response to DRA parties brief with respect to Monolines motion to lift stay.	0.30	765.00	229.50
03/23/20	JHG	Review email from Alex Bongartz regarding FOMB urgent motion seeking adjournment and related issues regarding timing and disclosures of bond trading activity.	1.40	765.00	1,071.00
03/23/20	JHG	Review urgent motion to adjourn.	0.10	765.00	76.50
03/23/20	MAF	Review underwriter notice of removal of monoline action, [REDACTED] (1.6), call with IS and JPB regarding the same, prior legal and fact research related to [REDACTED] (.4); review several emails among committee counsel and representatives regarding [REDACTED] (.4).	2.40	550.00	1,320.00
03/23/20	JA	Strategize regarding [REDACTED] (.6); confer with Angelo Castaldi (.3); research into 2019 disclosure-related facts (.6); review Motion for Adjournment (.1); confer and strategize with Joyce Delgado regarding research issues (.4); review additional 2019 disclosures issues (.8); review draft memorandum regarding Plan releases and related litigation issues (1.2)	4.00	575.00	2,300.00
03/23/20	JMS	Review AMBAC removal and attention to litigation issues with respect to Underwriter Litigation (1.6); continued review of LCDC and QTCB disclosures and attention to formulation of litigation strategy and related research (1.6).	3.20	500.00	1,600.00
03/23/20	JPB	Reviewed Kobre and Kim database documents in Batch JP6, Tranche 4 (65 documents).	1.70	375.00	637.50
03/23/20	JPB	Reviewed Kobre and Kim database documents in Batch JP6, Tranche 5 (55 documents).	1.40	375.00	525.00
03/23/20	JPB	Reviewed Kobre and Kim database documents in Batch JP6, Tranche 3 (47 documents).	1.10	375.00	412.50
03/23/20	AMC	Telephone conference with John Arrastia concerning going forward litigation strategy.	0.40	375.00	150.00
03/23/20	AMC	Conference call with John Arrastia and Joyce Delgado regarding litigation strategy.	0.40	375.00	150.00
03/23/20	AMC	Complete analysis concerning avoidance actions trust provisions within plan and disclosure statement, and impact of plan on existing Lien Challenge, ERS Avoidance, and Lien Scope litigations.	3.30	375.00	1,237.50

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03/23/20	EJ	Review and analyze legal research and memorandum on claims trading and conduct research into additional issues on appeals and mootness for memorandum on same.	2.40	475.00	1,140.00
03/23/20	JAD	Strategy conference regarding issues to analyze moving forward (.4)	0.40	315.00	126.00
		Analysis of memorandum on scheduling and deadlines (.3)			
03/23/20	JZ	Receipt and review of FOMB's Urgent Motion to Adjourn Hearing to Consider the Adequacy of Information Contained in the Disclosure Statement and Related Deadlines; receipt and review of Order Setting Briefing Schedule on same; calendar deadlines; circulate filings and update electronic case profile.	0.50	195.00	97.50
03/23/20	JZ	Receipt and review of UCC's Limited Joinder in FOMB'S Response to DRA Parties' Opening Response to (I) Motion of Assured Guaranty Corp., Assured Guaranty Municipal Corp., Ambac Assurance Corporation, National Public Finance Guarantee Corporation, and Financial Guaranty Insurance Company for Relief from the Automatic Stay, or, in the Alternative, Adequate Protection [ECF 10102], and (II) Opposition of Financial Oversight and Management Board for Puerto Rico to Motion of Assured Guaranty Corp., Assured Guaranty Municipal Corp., Ambac Assurance Corporation, National Public Finance Guarantee Corporation, and Financial Guaranty Insurance Company for Relief from the Automatic Stay, or, in the Alternative, Adequate Protection; update electronic case profile.	0.30	195.00	58.50
03/23/20	JZ	Attention to e-mails to and from A Castaldi and N. Basset regarding amended complaint in 19-355.	0.20	195.00	39.00
03/23/20	JZ	Receipt and review of UCC's Reply in further support of its Motion to Amend Tenth Amended Notice, Case Management and Administrative Procedures Regarding Disclosure Requirements; update electronic case profile.	0.30	195.00	58.50
03/23/20	JZ	Receipt of text only Order with regard to Ambac's 2004 requests (ECF 9022 and ECF 9023) and in light of the parties' Joint Report (ECF 12484), requiring the parties to file a Joint Status Report by April 10, 2020; calendar deadline.	0.20	195.00	39.00
03/23/20	SS	Review and Analyze documents in database produced by Kobre and Kim, Batch SS2, Tranche 50 (24 documents).	0.60	195.00	117.00
03/24/20	JHG	Review proposed order regarding ADR procedures.	0.30	765.00	229.50
03/24/20	JHG	Review email to Committee regarding case status and agenda for Committee.	0.20	765.00	153.00

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03/24/20	MAF	Review and analysis in context of prior internal memo numerous emails regarding [REDACTED] (1.7); review monoline insurer pleadings in multiple removed cases, review memo to file by JP Bado concernin [REDACTED] (1.3).	2.00	550.00	1,100.00
03/24/20	JA	Revise draft memorandum regarding Plan release issues (1.2); review and analyze retroactive 2019 disclosures (.4); strategize with Jesus Suarez regarding 2019 disclosure issues (.4); revise analytical framework [REDACTED] (.4); confer with Committee Chair, A. Velazquez, regarding case issues and litigation strategy to present to Committee (.3); revisions to memo regarding 2019 issues (.7); confer with Eric Jacobs regarding appellate issues (.2)	3.60	575.00	2,070.00
03/24/20	JMS	Continued review and analysis of [REDACTED]	2.30	500.00	1,150.00
03/24/20	JPB	Reviewed Kobre and Kim database documents in Batch JP6, Tranche 7 (97 documents).	4.20	375.00	1,575.00
03/24/20	JPB	Reviewed Kobre and Kim database documents in Batch JP6, Tranche 8 (63 documents).	2.10	375.00	787.50
03/24/20	JPB	Reviewed Kobre and Kim database documents in Batch JP6, Tranche 9 (44 documents).	2.20	375.00	825.00
03/24/20	AMC	Undertake substantial review and analysis of LCDC parties' Rule 2019 disclosures and analyze said recent disclosures against historical disclosures.	5.30	375.00	1,987.50
03/24/20	AMC	Began preparation of global analysis of the QTCB bondholders' historic Rule 2019 filings and holdings set forth therein.	1.60	375.00	600.00
03/24/20	TG	Prepare communication to Craig Treese @ Trustpoint. One re: review issues in Relativkty.	0.10	120.00	12.00
03/24/20	JZ	Receipt and review of 9019 Motion and Stipulation and Agreed Order (A) Allowing PRIFA BANs Guarantee Claim, (B) Authorizing Escrow of PRIFA Funds and (C) Directing the Dismissal of Litigation with Prejudice; circulate same; update electronic case profile.	0.40	195.00	78.00
03/24/20	JZ	Receipt and review of FOMB's Notice of Presentment of Further Revised Proposed Order (A) Authorizing Alternative Dispute Resolution Procedures, (B) Approving Additional Forms of Notice, and (C) Granting Related Relief in compliance with Court Order; UCC filed an opposition to the underlying motion [ECF 10146]; circulate filing; calendar response deadline; update electronic case profile.	0.40	195.00	78.00
03/24/20	JZ	Receipt and review of Motion for Compliance of Order on Second Omnibus Motion To Extend Deadlines In Order Granting Omnibus Motion To (I) Establish Litigation Case Management Procedures And (II) Establish Procedures For Approval Of Settlements; circulate same; update electronic case profile.	0.30	195.00	58.50

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03/25/20	JHG	Review research memorandum on [REDACTED] [REDACTED]	4.20	765.00	3,213.00
03/25/20	JHG	Review email from E. Jacobs regarding equitable mootness.	0.60	765.00	459.00
03/25/20	JHG	Review daily summary from S. Siff to identify and analyze strategic litigation issues.	0.30	765.00	229.50
03/25/20	JHG	Review ECF 12519, FOMB 9019.	0.80	765.00	612.00
03/25/20	MAF	Continue review of JP Bado memos and communications regarding research issues [REDACTED] [REDACTED]	6.70	550.00	3,685.00
03/25/20	JA	Continued revision and management of 2019 disclosure data (.7); attention to adjournment issues (.1); initial draft of litigation strategy outline addressing [REDACTED] and strategize regarding mode and order (2.1); review additional 2019 disclosure information (.4)	3.30	575.00	1,897.50
03/25/20	JPB	Reviewed Kobre and Kim database documents in Batch JP6, Tranche 11 (133 documents).	2.80	375.00	1,050.00
03/25/20	JPB	Reviewed Kobre and Kim database documents in Batch JP6, Tranche 12 (67 documents).	1.60	375.00	600.00
03/25/20	JPB	Reviewed Kobre and Kim database documents in Batch JP6, Tranche 10 (45 documents).	1.20	375.00	450.00
03/25/20	AMC	Complete analysis of historic GO / PBA / COFINA bond holdings of the QTCB ad hoc group.	1.70	375.00	637.50
03/25/20	AMC	Review of historic Rule 2019 disclosures of the Ad Hoc Group of Constitutional Bondholders and draft analysis of the same.	3.40	375.00	1,275.00
03/25/20	AMC	Tele-conference with Joyce Delgado concerning ongoing research projects.	0.40	375.00	150.00
03/25/20	AMC	Strategize wiith John Arrastia concerning various litigation issues, including inter alia [REDACTED] [REDACTED]	0.90	375.00	337.50
03/25/20	AMC	Review of QTCB group's response in opposition to Rule 2019 motion filed by Committee, analyze data attached to said opposition as Ex. A, and attent to substantial revisions to previously-drafted spreadsheet analyzing [REDACTED] [REDACTED]	3.20	375.00	1,200.00

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03/25/20	EJ	E-mails with John Arastia regarding scope of legal research into stays pending appeal and mootness relating to confirmation orders and releases (.3). Continued legal research into same (1.8).	2.10	475.00	997.50
03/25/20	JAD	Analysis of materials and case law concerning [REDACTED] [REDACTED]	2.80	315.00	882.00
03/25/20	JZ	Receipt and review of the UCC's Response to the Urgent Motion to Adjourn Hearing to Consider the Adequacy of Information Contained in the Disclosure Statement and Related Deadlines; circulate same; update electronic case profile.	0.30	195.00	58.50
03/25/20	JZ	Receipt and review of Notice of Hearing on the 9019 Motion and Stipulation and Agreed Order (A) Allowing PRIFA BANs Guarantee Claim, (B) Authorizing Escrow of PRIFA Funds and (C) Directing the Dismissal of Litigation with Prejudice; circulate same; calendar objection deadline and hearing date; update electronic case profile.	0.30	195.00	58.50
03/26/20	JHG	Review email from S. Siff identifying and analyzing strategic litigation issues.	0.60	765.00	459.00
03/26/20	JHG	Review ECF 12528, 12529, 12530, and 12535, Court order extending procedures order.	1.10	765.00	841.50
03/26/20	JHG	Strategize with J. Arrastia regarding 2019 issues, claims based on MNPI and litigation plan.	1.10	765.00	841.50
03/26/20	MAF	Resume and finalize drafting of memorandum regarding [REDACTED]	2.30	550.00	1,265.00
03/26/20	JA	Review Joint Status Report and Briefing Schedule (.1); review memorandum regarding [REDACTED] (.8); strategize regarding [REDACTED] (1.3); confer and strategize with John Genovese regarding [REDACTED] (1.1)	3.30	575.00	1,897.50
03/26/20	JPB	Reviewed Kobre and Kim database documents in Batch JP6, Tranche 14 (77 documents).	1.60	375.00	600.00
03/26/20	JPB	Reviewed Kobre and Kim database documents in Batch JP6, Tranche 13 (56 documents).	1.20	375.00	450.00
03/26/20	JPB	Reviewed Kobre and Kim database documents in Batch JP6, Tranche 15 (33 documents).	0.80	375.00	300.00
03/26/20	EJ	Continued legal research regarding [REDACTED].	2.80	475.00	1,330.00
03/26/20	AMC	Attend to revisions to internal memorandum concerning [REDACTED]	2.10	375.00	787.50
03/26/20	AMC	Review and analyze recent filings / briefing concerning Administrative Procedures Regarding Disclosure Requirements Pursuant to Federal Rule of Bankruptcy Procedure 2019.	1.70	375.00	637.50

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03/26/20	AMC	Review and analyze FOMB's urgent motion to adjourn hearing to consider adequacy of disclosure statement, and Committee's corresponding.	0.40	375.00	150.00
03/26/20	AMC	Review of parties' submissions in Nat'l Public Finance (Case No. 19-00422) and AMBAC v Merrill Lynch (Case No.: 20-00047).	0.70	375.00	262.50
03/26/20	AMC	Research concerning Rule 2004 discovery process under PROMESA and first circuit authorities.	1.60	375.00	600.00
03/26/20	JAD	Analysis of federal case law and authority regarding [REDACTED]	1.30	315.00	409.50
03/26/20	JAD	Continued analysis of case law and authority regarding [REDACTED]	3.40	315.00	1,071.00
03/26/20	JZ	Receipt and review of the Order Extending Litigation Case Management Procedures filed in the Vendor Avoidance Action complaint (19-276, 19-277, 19-279); calendar deadlines; e-mails to and from attorneys regarding filing and deadlines; update each electronic case profile.	0.70	195.00	136.50
03/27/20	JHG	Review informative motion ECF 12542, regarding COVID-19; review email from Alex Bongartz regarding COVID-19 and timing of various matters.	0.60	765.00	459.00
03/27/20	JA	Review motion regarding Covid-19 (.1); review FOMB Reply to Motion to Adjourn (.1); review court orders (.1); research regarding 2019 issues (1.3); strategize regarding 2019 issues (.8)	2.40	575.00	1,380.00
03/27/20	JPB	Reviewed Kobre and Kim database documents in Batch JP7, Tranche 2 (94 documents).	1.70	375.00	637.50
03/27/20	JPB	Reviewed Kobre and Kim database documents in Batch JP7, Tranche 3 (122 documents).	1.70	375.00	637.50
03/27/20	JPB	Reviewed Kobre and Kim database documents in Batch JP7, Tranche 1 (110 documents).	1.80	375.00	675.00
03/27/20	EJ	Continued legal research and analysis of [REDACTED]	2.70	475.00	1,282.50
03/27/20	AMC	Conduct research concerning potential [REDACTED]	5.80	375.00	2,175.00
03/27/20	JZ	Receipt and review of Order Granting Urgent Motion to Adjourn Hearing to Consider the Adequacy of Information Contained in the Disclosure Statement and Related Deadlines; circulate same; calendar deadline to file status report; update electronic case profile.	0.40	195.00	78.00

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03/27/20	JZ	Receipt and review of FOMB's reply in support of the Urgent Motion to Adjourn Hearing to Consider the Adequacy of Information Contained in the Disclosure Statement and Related Deadlines; circulate same; update electronic case profile.	0.30	195.00	58.50
03/27/20	JZ	Receipt and review of AAFAF's Information Motion Regarding the Government of Puerto Rico's Response to COVID-19 and the Impact of Title III Cases [ECF No 12542]; circulate same; update electronic case profile.	0.30	195.00	58.50
03/27/20	JNS	Assist in reviewing each adversary case docket to ensure all filings have been reviewed and downloaded.conference with J Zamora regarding streamlining calendaring process moving forward	1.30	75.00	97.50
03/29/20	JA	Prepare initial draft regarding outline regarding potential litigation strategy.	1.80	575.00	1,035.00
03/30/20	JHG	Review email from fee examiner and forward same.	0.30	765.00	229.50
03/30/20	JHG	Review and analyze email from J. Arrastia regarding discovery under Rule 2019 [REDACTED]	1.60	765.00	1,224.00
03/30/20	JHG	Review daily summary from S. Siff attaching ECF 12560, joint response to Fuel Line Lenders adjournment motion and analyze timing issue.	0.40	765.00	306.00
03/30/20	JHG	Review email and attachment from A. Castaldi modifying outline of scope of work regarding [REDACTED]	1.40	765.00	1,071.00
03/30/20	JA	Prepare draft of outline litigation strategy (3.8); prepare email correspondence regarding case issues (.4); review initial comments to outline and revise (.3); prepare memorandum regarding litigation issues (.8)	5.30	575.00	3,047.50
03/30/20	JA	Review Response to Adjournment Motion (.1); review Limited Reply regarding 2019 (.2); review Committee statement (.1); review Reply in Support of Cross Statement (.4)	0.80	575.00	460.00
03/30/20	JMS	Extensive research concerning scope of [REDACTED] (3.4); review rule 2004 issues related to same (1.8)	5.20	500.00	2,600.00
03/30/20	JPB	Reviewed Kobre and Kim database documents in Batch JP7, Tranche5 (225 documents).	1.80	375.00	675.00
03/30/20	JPB	Reviewed Kobre and Kim database documents in Batch JP7, Tranche 4 (113 documents).	1.20	375.00	450.00
03/30/20	IRS	Attend to internal correspondence regarding [REDACTED] (.2)	0.20	350.00	70.00
03/30/20	AMC	Research concerning [REDACTED]	1.70	375.00	637.50
03/30/20	AMC	Research concerning [REDACTED]	1.30	375.00	487.50

PROMESA - Official Committee of Unsecured Creditors
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03/30/20	AMC	Research and prepare research memorandum concerning [REDACTED]	3.60	375.00	1,350.00
03/30/20	AMC	Analyze and strategize regarding legal research and analytical issues relating to [REDACTED]	1.30	375.00	487.50
03/30/20	AMC	Evaluate [REDACTED]	0.30	375.00	112.50
03/30/20	JAD	Preparation of Memorandum of Law regarding [REDACTED]	5.80	315.00	1,827.00
03/30/20	JZ	Numerous internal e-mails regarding creating new system for case updating and meetings; commence updating master excel chart to include additional stay information.	2.50	195.00	487.50
03/31/20	JHG	Review and analyze internal email from A. Castaldi regarding benefit analysis [REDACTED] (1.0); confer with E. Jacobs (.3); confer and strategize with J. Arrastia, M. Friedman, J. Genovese and J. Suarez (1.1)	2.40	765.00	1,836.00
03/31/20	JA	Strategy conference with J. Genovese, J. Suarez, A. Castaldi and M. Friedman regarding litigation plan (1.1); legal research and analysis (1.8); review analysis of Plan issues relating to litigation (.8); strategize (1.3)	0.70	575.00	402.50
03/31/20	JMS	Continued research and development of [REDACTED] (.7); analysis of COVID related proceedings concerning litigation issues handled by GJB (1.1); confer and strategize with litigation team (1.1)	2.90	500.00	1,450.00
03/31/20	MAF	Review and consider redlined scope of work and pro / con analysis relating to [REDACTED] (1.2); attend strategy call with group regarding the same (1.4); further consideration of and proposed revisions to scope of work outline, and research in connection with the same (2.0)	4.60	550.00	2,530.00
03/31/20	EJ	Review case law and analysis prior to call with John Genovese (.6). Telephone conference with John Genovese regarding research done [REDACTED] (.3).	0.90	475.00	427.50
03/31/20	JPB	Reviewed Kobre and Kim database documents in Batch JP7, Tranche 7 (132 documents).	1.80	375.00	675.00
03/31/20	JPB	Reviewed Kobre and Kim database documents in Batch JP7, Tranche 6 (148 documents).	2.20	375.00	825.00

PROMESA - Official Committee of Unsecured Creditors
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03/31/20	AMC	Further analyze [REDACTED] [REDACTED]	2.80	375.00	1,050.00
03/31/20	AMC	Strategy conference with GJB team to discuss going-forward litigation strategy, potential discovery issues, and plan objections.	1.10	375.00	412.50
03/31/20	AMC	Further analyze [REDACTED] [REDACTED]	2.10	375.00	787.50
03/31/20	AMC	Research of bankruptcy primary and secondary authorities concerning effect of [REDACTED] [REDACTED]	2.90	375.00	1,087.50
03/31/20	JAD	Analysis of federal case law and authority regarding [REDACTED] [REDACTED]	3.40	315.00	1,071.00
Subtotal: B191 / General Litigation			386.40		\$186,165.00
B210 / Debtors' Fiscal Plan					
03/25/20	JMS	Research concerning plan objection issues (2.3) and potential appellate remedies (1.5).	3.80	500.00	1,900.00
03/26/20	JMS	Research plan objection issues concerning [REDACTED]	2.50	500.00	1,250.00
Subtotal: B210 / Debtors' Fiscal Plan			6.30		\$3,150.00
B320 / Plan and Disclosure Statement					
03/01/20	JA	Continued review of Disclosure Statement as to issues relevant to UCC litigation strategies	1.70	575.00	977.50
03/02/20	JA	Continued review of Amended Joint Plan of Adjustment.	1.70	575.00	977.50
03/02/20	JA	Continued review of Disclosure Statement as as to specific, relevant items and potential objections by Committee.	1.60	575.00	920.00
03/02/20	JZ	Receipt and review of the Disclosure Statement and the Amended Joint Plan of Adjustment; update electronic case profile.	0.50	195.00	97.50
03/04/20	MAF	Review and analyze memorandum regarding remedies available with respect to [REDACTED] [REDACTED] (4.6);	4.60	550.00	2,530.00
03/05/20	MAF	Conference call with A Castaldi to discuss research memo, issues implicated, suggested additional research and facts to add to product (0.5)	0.50	550.00	275.00

PROMESA - Official Committee of Unsecured Creditors
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03/05/20	MGG	Review Motion of Official Committee of Unsecured Creditors Pursuant to Federal Rule of Bankruptcy Procedure 3013 for Entry of Order Reclassifying Class 39A and Class 41 Claims Under Oversight Board's Plan of Adjustment dated February 28, 2020.	0.20	575.00	115.00
03/05/20	JA	Continued review and analysis of specific litigation related issues in Disclosure Statement	1.80	575.00	1,035.00
03/05/20	JA	Review analysis of GO Recoveries in Plan Support Agreement	0.60	575.00	345.00
03/10/20	JHG	Review final order regarding stay, mandatory mediation and deadlines and analysis of stay implications.	1.30	765.00	994.50
03/11/20	MGG	Revise and amended Initial review and memorandum of Oversight Board's proposed Amended Plan of adjustment for the Commonwealth to incorporate in analysis drafted by Angelo Castaldi.	0.80	575.00	460.00
03/11/20	JA	Review analysis of Proposed Amended Commonwealth Plan of Adjustment.	2.20	575.00	1,265.00
03/12/20	JA	Review discovery outline regarding Disclosure Statement (.8);	0.80	575.00	460.00
03/16/20	MAF	Email from A Castaldi, review most recent draft of [REDACTED] (1.3).	1.30	550.00	715.00
03/19/20	AMC	Analyze Commonwealth amended plan of adjustment (as it relates to matters handled by the Firm).	4.30	375.00	1,612.50
03/20/20	JA	Attention to Plan Release issues and impact on litigation strategy (1.3); Review Order on Joint Motion Regarding Discovery (.1); initial review of Notice of Removal (1.3); review of QTCB Opposition to 2019 Motion (.4)	3.10	575.00	1,782.50
03/30/20	MAF	Review email from J Arrastia regarding memoranda required by committee with respect to [REDACTED] (.3)	0.30	550.00	165.00
Subtotal: B320 / Plan and Disclosure Statement			27.30		\$14,727.00
Total			541.80		\$239,853.50

PROMESA - Official Committee of Unsecured Creditors
12272-001
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Timekeeper Summary

<u>ID</u>	<u>Timekeeper Name</u>	<u>Title</u>	<u>BillHours</u>	<u>BillRate</u>	<u>BillAmount</u>
JHG	John H Genovese	Sr. Partner	62.90	765.00	48,118.50
JMS	Jesus M Suarez	Partner	32.80	500.00	16,400.00
MAF	Michael A Friedman	Partner	30.80	550.00	16,940.00
ALG	Alfredo L Gonzalez	Partner	23.30	565.00	13,164.50
MGG	Mariaelena Gayo-Guitian	Partner	14.20	575.00	8,165.00
JA	John Arrastia	Partner	88.10	575.00	50,657.50
JAD	Joyce A Delgado	Associate	17.10	315.00	5,386.50
IRS	Irina R Sadovnic	Associate	0.20	350.00	70.00
JPB	JP Bado	Associate	37.20	375.00	13,950.00
AMC	Angelo M Castaldi	Associate	103.40	375.00	38,775.00
EJ	Eric Jacobs	Associate	10.90	475.00	5,177.50
JNS	Jessey N Sardina	Paralegal	3.10	75.00	232.50
TG	Tricia Garcia-Montes	Paralegal	0.20	120.00	24.00
CE	Carolyn Esser	Paralegal	3.10	150.00	465.00
CBH	Colleen B Hopkins	Paralegal	12.20	195.00	2,379.00
SS	Steve Siff	Paralegal	65.90	195.00	12,850.50
JZ	Johana Zamora	Paralegal	36.40	195.00	7,098.00
Total			541.80		\$239,853.50

Costs and incurrent and advanced

<u>Date</u>	<u>Description</u>	<u>Amount</u>
	Copies	1,334.70
	Pacer - Online Research	821.40
11/28/2019	Translation Service (12272-001) Targem Translations 12992	3,101.76

Total Costs incurrent and advanced

\$5,257.86

Current Fees and Costs

\$245,111.36

Genovese Joblove & Battista, P.A.

100 Southeast Second Street, 44th Floor
Miami, Florida 33131
Telephone (305) 349-2300 Facsimile (305) 349-2310
Employer ID# 65-0518134

PROMESA - Official Committee of Unsecured Creditors

July 7, 2020
Please Refer to
Invoice Number: 98304

Attn:

GJB Tax ID No. 65-0518134

Re: PROMESA: Official Committee of Unsecured Creditors / PREPA Adversary - Puerto Rico Electric Power Authority

SUMMARY / REMITTANCE COPY

Client/Matter # 12272-002

PROMESA - Official Committee of Unsecured Creditors

PROMESA: Official Committee of Unsecured Creditors / PREPA Adversary - Puerto Rico Electric Power Authority

(Services rendered outside of Puerto Rico)

For fees for professional services
for the period ending Mar 31, 2020

883.00

Costs incurred and advanced

56.40

Current Fees and Costs Due

939.40

We encourage our clients to pay via ACH, however, in the event that you pay by check, please send payment to the remittance address below:

TO PROTECT AGAINST FRAUD, the Firm will not change its wiring instructions via email. We strongly encourage clients to confirm any change in wiring instructions by contacting Ken Forrest @ 305-349-2312 or via email @ kforrest@gjb-law.com and requesting written and verbal confirmation.

Wiring and ACH Instructions:

Bank Name: Biscayne Bank
Bank Telephone: 305-447-5050
Account Name: Genovese Joblove & Battista, P.A. - Operating
Routing Number : 066015767
Account Number : 21007711

Remittance Address:

Genovese Joblove & Battista, P.A.
100 Southeast Second Street, 44th Floor
Miami, Florida 33131

For payment, please reference the invoice, client and matter number(s) being paid.
Please refer all questions to Ken Forrest @ 305-349-2312 or via email @ kforrest@gjb-law.com

Genovese Joblove & Battista, P.A.

100 Southeast Second Street, 44th Floor
Miami, Florida 33131
Telephone (305) 349-2300 Facsimile (305) 349-2310
Employer ID# 65-0518134

PROMESA - Official Committee of Unsecured Creditors

July 7, 2020
Please Refer to
Invoice Number: 98304

Attn:

GJB Tax ID No. 65-0518134

Re: PROMESA: Official Committee of Unsecured Creditors / PREPA Adversary - Puerto Rico Electric Power Authority

FOR PROFESSIONAL SERVICES RENDERED
for the period ending Mar 31, 2020

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
B110 / Case Administration					
03/26/20	JZ	E-mails from and to J. Arrastia regarding status of PREPA 9019 deadline and hearings along with status of the Fuel Oil Complaint in-light of the recently entered orders on the COV19 virus; review of docket; circulate memo with findings.	0.40	195.00	78.00
Subtotal: B110 / Case Administration			0.40		\$78.00
B191 / General Litigation					
03/05/20	JA	Strategize regarding Vitol Notice of Removal.	0.30	575.00	172.50
03/09/20	JZ	Attention to calendaring regarding 9019 deadlines.	0.50	195.00	97.50
03/26/20	AMC	Brief review of recent briefings in PREPA v Vitol Case No.: 19-00453 concerning remand issues.	0.60	375.00	225.00
03/27/20	JA	Review statement regarding adjourning RSA (.1); review motion (.1)	0.20	575.00	115.00
03/27/20	JZ	Receipt and review of Joint Urgent Motion which seeks the adjournment of the hearing on, and all remaining deadlines applicable to the PREPA 9019 motion [ECF No. 1947]; receipt and review of the Order setting briefing schedule on same [ECF No. 1948; circulate filings; calendar proposed deadlines; update electronic case profile.	0.60	195.00	117.00
03/31/20	JZ	Receipt and review of Union Entities Response to the Urgent Joint Motion of the Government Parties to Adjourn All Deadlines Applicable to the PREPA 9019 motion; circulate same; update electronic case profile.	0.40	195.00	78.00
Subtotal: B191 / General Litigation			2.60		\$805.00
Total			3.00		\$883.00

PROMESA - Official Committee of Unsecured Creditors
12272-002
Invoice No. 98304

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Timekeeper Summary

<u>ID</u>	<u>Timekeeper Name</u>	<u>Title</u>	<u>BillHours</u>	<u>BillRate</u>	<u>BillAmount</u>
JA	John Arrastia	Partner	0.50	575.00	287.50
AMC	Angelo M Castaldi	Associate	0.60	375.00	225.00
JZ	Johana Zamora	Paralegal	1.90	195.00	370.50
Total			3.00		\$883.00

Costs and incurrent and advanced

<u>Date</u>	<u>Description</u>	<u>Amount</u>
	Pacer - Online Research	56.40
Total Costs incurrent and advanced		\$56.40
Current Fees and Costs		\$939.40

Genovese Joblove & Battista, P.A.

100 Southeast Second Street, 44th Floor
Miami, Florida 33131
Telephone (305) 349-2300 Facsimile (305) 349-2310
Employer ID# 65-0518134

PROMESA - Official Committee of Unsecured Creditors

July 7, 2020
Please Refer to
Invoice Number: 98305

Attn:

GJB Tax ID No. 65-0518134

Re: PROMESA: Official Committee of Unsecured Creditors / ERS Litigation - Employees Retirement System of the
~~Government - Commonwealth of Puerto Rico~~

SUMMARY / REMITTANCE COPY

Client/Matter # 12272-003
PROMESA - Official Committee of Unsecured Creditors
PROMESA: Official Committee of Unsecured Creditors / ERS Litigation - Employees Retirement System of the Government
Commonwealth of Puerto Rico

(Services rendered outside of Puerto Rico)

For fees for professional services for the period ending Mar 31, 2020	8,297.00
Costs incurred and advanced	
Current Fees and Costs Due	8,297.00

We encourage our clients to pay via ACH, however, in the event that you pay by check, please send payment to the remittance address below:

TO PROTECT AGAINST FRAUD, the Firm will not change its wiring instructions via email. We strongly encourage clients to confirm any change in wiring instructions by contacting Ken Forrest @ 305-349-2312 or via email @ kforrest@gjb-law.com and requesting written and verbal confirmation.

Wiring and ACH Instructions:

Bank Name: Biscayne Bank
Bank Telephone: 305-447-5050
Account Name: Genovese Joblove & Battista, P.A. - Operating
Routing Number : 066015767
Account Number : 21007711

Remittance Address:

Genovese Joblove & Battista, P.A.
100 Southeast Second Street, 44th Floor
Miami, Florida 33131

For payment, please reference the invoice, client and matter number(s) being paid.
Please refer all questions to Ken Forrest @ 305-349-2312 or via email @ kforrest@gjb-law.com

Genovese Joblove & Battista, P.A.

100 Southeast Second Street, 44th Floor
Miami, Florida 33131
Telephone (305) 349-2300 Facsimile (305) 349-2310
Employer ID# 65-0518134

PROMESA - Official Committee of Unsecured Creditors

July 7, 2020
Please Refer to
Invoice Number: 98305

Attn:

GJB Tax ID No. 65-0518134

Re: PROMESA: Official Committee of Unsecured Creditors / ERS Litigation - Employees Retirement System of the
~~Government Commonwealth of Puerto Rico~~

FOR PROFESSIONAL SERVICES RENDERED
for the period ending Mar 31, 2020

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
B191 / General Litigation					
03/02/20	JA	Review correspondence regarding depositions (.2); review correspondence regarding Jones Day Bondholder documents (.1); review additional deposition correspondence (.2); review correspondence regarding deposition of ERS bondholders (.2)	0.70	575.00	402.50
03/03/20	JA	Review correspondence regarding production.	0.10	575.00	57.50
03/03/20	IRS	Attend to ERS bondholder production (.5)	1.10	350.00	385.00
		Review draft motion to extend deposition schedule due to delayed production of discovery. (.3)			
		Review correspondence to Bondholders regarding deposition topics and comments to objections. (.3)			
03/04/20	JA	Review email correspondence regarding deposition (.1); review correspondence from Jones Day re: depositions of ERS Bondholders re: Ultra Vires (.3)	0.40	575.00	230.00
03/05/20	IRS	Review draft motion to extend vendor litigation deadlines.	0.30	350.00	105.00
03/09/20	IRS	Attend to service of ERS discovery from bondholders and third-party defendants and coordinate download and classification of same.	0.80	350.00	280.00
03/10/20	JA	Review discovery related correspondence (.1); Review case status summary (.2)	0.30	575.00	172.50
03/10/20	IRS	Attend to ERS discovery matters relating to GJB review and filing of third party requests and responses.	0.40	350.00	140.00
03/11/20	JZ	Revise Amended Complaint in ADV. 19-355; e-mail same to A. Castaldi for review and revision.	0.60	195.00	117.00

PROMESA - Official Committee of Unsecured Creditors
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03/11/20	JZ	Receipt and review of Motion requesting extension of time to answer complaint filed by N. Osorio; circulate same; update electronic case profile.	0.30	195.00	58.50
03/12/20	IRS	Review order in AP 19-357 regarding joint status report and prepare internal correspondence regarding same. (.3)	0.30	350.00	105.00
03/12/20	JNS	Conference with JZamora regarding daily emails from Steve Siff and case calendaring. Attention to emails from J Zamora regarding calendar deadlines	0.70	75.00	52.50
03/12/20	JZ	Receipt and review of Order Setting Briefing Schedule re: Motion requesting extension of time to answer complaint filed by N. Osorio in ADV 19-357; calendar deadline to file response; circulate Order; e-mails to and from J. Arrastia regarding compliance; update electronic case profile.	0.40	195.00	78.00
03/13/20	JA	Reveiw correspondence addressing discovery issues	0.10	575.00	57.50
03/13/20	JZ	Receipt and review of Joint Motion in Compliance with Briefing Order relating to the Motion requesting extension of time to answer complaint filed by N. Osorio in 19-357; circulate same; update electronic case profile.	0.30	195.00	58.50
03/17/20	JA	Review correspondence regarding discovery (.1); review proposed order regarding pre-solicitation, etc. (.2);	0.30	575.00	172.50
03/17/20	JMS	Work on litigation development concerning 2019 disclosures and trading of debt.	2.10	500.00	1,050.00
03/19/20	JZ	Receipt and review of Joint Motion Regarding Discovery and Briefing Schedule filed in ERS ADV. Cases 19-356, 19-357, 19-359, 19-361 and 19-367; circulate same; update electronic case profiles.	0.60	195.00	117.00
03/20/20	JZ	Receipt and review of Order on Joint Motion Regarding Discovery and Briefing Schedule filed in ERS ADV. Cases 19-356, 19-357, 19-359, 19-361 and 19-367; circulate same; calendar deadline to filer status report; update electronic case profiles.	0.60	195.00	117.00
03/23/20	JA	Review Dismissal of ERS Bondholder for lack of holdings and analyze same.	0.20	575.00	115.00
03/25/20	JA	Analyze case issues relating to service and dismissal of parties and lack of service on proper parties (1.6); strategize with John Genovese regarding same (.4); confer with Angelo Castaldi (.4)	2.40	575.00	1,380.00
03/25/20	JZ	Receipt and review of joint status report concerning the briefing and discovery deadlines in filed in ERS Adv. 19-356, 19-357, 19-359, 19-361, and 19-367; circulate filings; update each electronic case profile.	0.70	195.00	136.50
03/26/20	JA	Review court orders.	0.20	575.00	115.00
03/26/20	AMC	Review and analyze orders (and related briefings) concerning certain issues raised (and deadlines imposed) in adversary proceedings related to ERS bonds.	0.80	375.00	300.00

PROMESA - Official Committee of Unsecured Creditors
12272-003
Invoice No. 98305

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03/26/20	JZ	Receipt and review of Orders on joint status report concerning the briefing and discovery deadlines in filed in ERS Adv. 19-356, 19-357, 19-359, 19-361, and 19-367; circulate filings; calendar deadlines; update each electronic case profile.	0.80	195.00	156.00
03/27/20	JA	Confer and strategize regarding dismissal and service issues based on service on improperly named party (.4); confer with N. Basset of Paul Hastings (.1); confer and strategize with Angelo Castaldi (.3); identify legal research projects (.3)	1.10	575.00	632.50
03/27/20	IRS	Strategize regarding limited legal research and analysis in support of motion for extension of time to effectuate service of process based on improperly named defendant.	0.40	350.00	140.00
03/27/20	JZ	Receipt and review of Fourth Supplemental Informative Motion Regarding Notices of Participation and Notices of Appearance Filed in Connection with Objections to ERS Bond Claims [ECF No. 80]; circulate same; update electronic case profile.	0.30	195.00	58.50
03/29/20	IRS	Review and analyze Court Order ECF No 12359 as pertaining to GJB-involved ERS adversary proceedings.	0.50	350.00	175.00
03/30/20	JA	Review status update of various pending ERS matters.	0.20	575.00	115.00
03/30/20	IRS	Prepare legal analysis regarding recent order requiring joint status report in certain ERS AP cases and provide recommendations as to briefing schedule. (.4)	0.60	350.00	210.00
		Prepare correspondence to UCC counsel regarding joint response required under ECF 12359. (.2)			
03/31/20	IRS	Conduct legal research and analysis regarding extension of time for service after expiration of statute of limitations if improperly named party was served (1.4)	2.60	350.00	910.00
		Prepare written analysis regarding legal status of service (1.2)			
03/31/20	JZ	Receipt and review of the Renewed Motion for Relief from Automatic Stay filed by UBS Financial Services of Puerto Rico; receipt and review of the Notice of Hearing on same; circulate filings; calendar hearing date and deadlines; update electronic case profile.	0.50	195.00	97.50
Subtotal: B191 / General Litigation			21.70		\$8,297.00
Total			21.70		\$8,297.00

PROMESA - Official Committee of Unsecured Creditors
12272-003
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Timekeeper Summary

<u>ID</u>	<u>Timekeeper Name</u>	<u>Title</u>	<u>BillHours</u>	<u>BillRate</u>	<u>BillAmount</u>
JMS	Jesus M Suarez	Partner	2.10	500.00	1,050.00
JA	John Arrastia	Partner	6.00	575.00	3,450.00
IRS	Irina R Sadovnic	Associate	7.00	350.00	2,450.00
AMC	Angelo M Castaldi	Associate	0.80	375.00	300.00
JNS	Jessey N Sardina	Paralegal	0.70	75.00	52.50
JZ	Johana Zamora	Paralegal	5.10	195.00	994.50
	Total		21.70		\$8,297.00

Current Fees and Costs

\$8,297.00

Genovese Joblove & Battista, P.A.

100 Southeast Second Street, 44th Floor
Miami, Florida 33131
Telephone (305) 349-2300 Facsimile (305) 349-2310
Employer ID# 65-0518134

PROMESA - Official Committee of Unsecured Creditors

July 7, 2020
Please Refer to
Invoice Number: 98306

Attn:

GJB Tax ID No. 65-0518134

Re: PROMESA: Official Committee of Unsecured Creditors / HTA Litigation - Puerto Rico Highways & Transportation Authority

SUMMARY / REMITTANCE COPY

Client/Matter # 12272-004

PROMESA - Official Committee of Unsecured Creditors

PROMESA: Official Committee of Unsecured Creditors / HTA Litigation - Puerto Rico Highways & Transportation Authority

(Services rendered outside of Puerto Rico)

For fees for professional services
for the period ending Mar 31, 2020

1,432.50

Costs incurred and advanced

Current Fees and Costs Due

1,432.50

We encourage our clients to pay via ACH, however, in the event that you pay by check, please send payment to the remittance address below:

TO PROTECT AGAINST FRAUD, the Firm will not change its wiring instructions via email. We strongly encourage clients to confirm any change in wiring instructions by contacting Ken Forrest @ 305-349-2312 or via email @ kforrest@gjb-law.com and requesting written and verbal confirmation.

Wiring and ACH Instructions:

Bank Name: Biscayne Bank
Bank Telephone: 305-447-5050
Account Name: Genovese Joblove & Battista, P.A. - Operating
Routing Number : 066015767
Account Number : 21007711

Remittance Address:

Genovese Joblove & Battista, P.A.
100 Southeast Second Street, 44th Floor
Miami, Florida 33131

For payment, please reference the invoice, client and matter number(s) being paid.
Please refer all questions to Ken Forrest @ 305-349-2312 or via email @ kforrest@gjb-law.com

Genovese Joblove & Battista, P.A.

100 Southeast Second Street, 44th Floor
Miami, Florida 33131
Telephone (305) 349-2300 Facsimile (305) 349-2310
Employer ID# 65-0518134

PROMESA - Official Committee of Unsecured Creditors

July 7, 2020
Please Refer to
Invoice Number: 98306

Attn:

GJB Tax ID No. 65-0518134

Re: PROMESA: Official Committee of Unsecured Creditors / HTA Litigation - Puerto Rico Highways & Transportation
Authority

FOR PROFESSIONAL SERVICES RENDERED
for the period ending Mar 31, 2020

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
B110 / Case Administration					
03/19/20	JZ	Review of e-mail from C. Tarrant at Proskauer attaching the Spanish translations of the Final Case Management Order for Revenue Bonds; and Final Order Regarding (A) Stay Period, (B) Mandatory Mediation and (C) Certain Deadlines in ADV. 19-364; create service package including the Orders in English and Spanish and coordinate service with PrimeClerk; update electronic case profile.	0.50	195.00	97.50
Subtotal: B110 / Case Administration			0.50		\$97.50
B191 / General Litigation					
03/10/20	JHG	Review ECF 12186, HTA 729 final case management order and analyze.	1.10	765.00	841.50
03/11/20	JNS	Calendaring of deadlines set in Orders [ECF No. 12187] and [ECF No. 12186]	0.60	75.00	45.00
03/12/20	JZ	Review of e-mail from C. Tarrant at Proskauer regarding service of the Final Case Management Order for Revenue Bonds; and Final Order Regarding (A) Stay Period, (B) Mandatory Mediation and (C) Certain Deadlines in ADV. 19-364; e-mails from and J. Arrastia regarding same.	0.30	195.00	58.50
03/19/20	JZ	Receipt and review of Order Regarding 4/2 hearing on HTA Lift Stay Motions; calendar deadlines; update electronic case profile.	0.30	195.00	58.50
03/23/20	JZ	E-mail to and from J. Arrastia regarding attendance at the April 2nd stay hearings and deadline to file joint status report regarding same.	0.20	195.00	39.00
03/26/20	JZ	Receipt and review of Joint Stipulation to modify certain dates and deadlines set forth in the Court's March 10, 2020 Final Case Management Order for Revenue Bonds re: HTA [ECF No. 755]; receipt of Order granting same; calendar numerous deadlines and hearing dates; circulate filings; update electronic case profile.	0.80	195.00	156.00

PROMESA - Official Committee of Unsecured Creditors
12272-004
Invoice No. 98306

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03/31/20	JZ	Receipt and review of Motion of the FOMB for entry of an order, directing Ambac Assurance Corporation to withdraw its complaint; receipt of Notice of hearing on same; circulate filings; calendar hearing date and objection deadlines.	0.40	195.00	78.00
03/31/20	JZ	Receipt and review of the Informative Motion of the FOMB Regarding Publication Of (A) Notice Of Deadlines For Filing Proofs Of Claim For Creditors Of The Puerto Rico PBA, (B) Notice Of Extended Deadlines For Filing Proofs Of Claim For Creditors Of The PBA and (C) Notice Of Deadline For Submitting Information Forms For Retirement Beneficiaries Of The Commonwealth Of Puerto Rico And The ERS; update electronic case profile.	0.30	195.00	58.50
Subtotal: B191 / General Litigation			4.00		\$1,335.00
Total			4.50		\$1,432.50

Timekeeper Summary

<u>ID</u>	<u>Timekeeper Name</u>	<u>Title</u>	<u>BillHours</u>	<u>BillRate</u>	<u>BillAmount</u>
JHG	John H Genovese	Sr. Partner	1.10	765.00	841.50
JNS	Jessey N Sardina	Paralegal	0.60	75.00	45.00
JZ	Johana Zamora	Paralegal	2.80	195.00	546.00
Total			4.50		\$1,432.50

Current Fees and Costs

\$1,432.50

Genovese Joblove & Battista, P.A.

100 Southeast Second Street, 44th Floor
Miami, Florida 33131
Telephone (305) 349-2300 Facsimile (305) 349-2310
Employer ID# 65-0518134

PROMESA - Official Committee of Unsecured Creditors

July 7, 2020
Please Refer to
Invoice Number: 98308

Attn:

GJB Tax ID No. 65-0518134

Re: PROMESA: Official Committee of Unsecured Creditors / Special Conflict Counsel

SUMMARY / REMITTANCE COPY

Client/Matter # 12272-001
PROMESA - Official Committee of Unsecured Creditors
PROMESA: Official Committee of Unsecured Creditors / Special Conflict Counsel

(Services rendered outside of Puerto Rico)

For fees for professional services for the period ending Apr 30, 2020	228,620.50
Costs incurred and advanced	<u>7,029.08</u>
Current Fees and Costs Due	235,649.58

We encourage our clients to pay via ACH, however, in the event that you pay by check, please send payment to the remittance address below:

TO PROTECT AGAINST FRAUD, the Firm will not change its wiring instructions via email. We strongly encourage clients to confirm any change in wiring instructions by contacting Ken Forrest @ 305-349-2312 or via email @ kforrest@gjb-law.com and requesting written and verbal confirmation.

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Genovese Joblove & Battista, P.A.
100 Southeast Second Street, 44th Floor
Miami, Florida 33131

For payment, please reference the invoice, client and matter number(s) being paid.
Please refer all questions to Ken Forrest @ 305-349-2312 or via email @ kforrest@gjb-law.com

Genovese Joblove & Battista, P.A.

100 Southeast Second Street, 44th Floor
Miami, Florida 33131
Telephone (305) 349-2300 Facsimile (305) 349-2310
Employer ID# 65-0518134

PROMESA - Official Committee of Unsecured Creditors

July 7, 2020
Please Refer to
Invoice Number: 98308

Attn:

GJB Tax ID No. 65-0518134

Re: PROMESA: Official Committee of Unsecured Creditors / Special Conflict Counsel

FOR PROFESSIONAL SERVICES RENDERED
for the period ending Apr 30, 2020

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
B110 / Case Administration					
04/01/20	JA	Attend Committee Meeting to discuss pending matters.	0.90	575.00	517.50
04/01/20	JZ	Review of internal report circulated by S. Siff.	0.30	195.00	58.50
04/02/20	JZ	Review of internal report circulated by S. Siff.	0.40	195.00	78.00
04/03/20	JZ	Review of internal report circulated by S. Siff.	0.30	195.00	58.50
04/06/20	JZ	Review of internal report circulated by S. Siff.	0.40	195.00	78.00
04/07/20	JZ	Review of internal report circulated by S. Siff.	0.20	195.00	39.00
04/08/20	JZ	Conference with I. Sadovnic Confer regarding recent orders and calendaring protocol.	0.30	195.00	58.50
04/08/20	JZ	Review of internal report circulated by S. Siff.	0.30	195.00	58.50
04/09/20	JZ	Commence updating the master excel sheet which lists each defendant in each adversary case (not the consolidated excel) to include new deadlines and status.	1.50	195.00	292.50
04/09/20	JZ	Review of internal report circulated by S. Siff.	0.40	195.00	78.00
04/13/20	JZ	Review of internal report circulated by S. Siff.	0.20	195.00	39.00
04/14/20	JZ	Review of internal report circulated by S. Siff.	0.30	195.00	58.50

PROMESA - Official Committee of Unsecured Creditors
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04/15/20	JZ	Finalize the updating of the master excel sheet which lists each defendant in each adversary case (not the consolidated excel) to include new deadlines and status.	1.60	195.00	312.00
04/15/20	JZ	Review of internal report circulated by S. Siff.	0.40	195.00	78.00
04/16/20	JZ	Review of internal pleading report circulated by S. Siff.	0.50	195.00	97.50
04/16/20	JZ	Internal conference regarding matters scheduled for hearing on April 22nd; review of calendar; draft outline of matters scheduled for hearing and our involvement in same.	0.70	195.00	136.50
04/17/20	JZ	Review of internal pleading report circulated by S. Siff.	0.40	195.00	78.00
04/17/20	JZ	Conference with J. Arrastia regarding next week's hearings and his conversation with the Fee Examiner requesting that we provide both detailed and redacted time entries from February, 2020 forward.	0.50	195.00	97.50
04/20/20	JZ	Receipt and review of the Agenda for the April 22nd hearing; circulate same; update electronic case profile.	0.40	195.00	78.00
04/21/20	JZ	Review of internal pleading report circulated by S. Siff.	0.50	195.00	97.50
04/21/20	JZ	Assist in preparation for tomorrow's Omnibus hearing.	0.60	195.00	117.00
04/21/20	JZ	Receipt and review of AAFAP's Status Report regarding the Government of Puerto Rico's recent activities in response to the Covid 19 virus; circulate same; update electronic case profile.	0.30	195.00	58.50
04/21/20	JZ	Receipt and review of FOMB's Status Report regarding the Government of Puerto Rico's recent activities in response to the Covid 19 virus; circulate same; update electronic case profile.	0.30	195.00	58.50
04/22/20	JZ	Review of internal pleading report circulated by S. Siff.	0.40	195.00	78.00
04/23/20	JZ	Review of internal pleading report circulated by S. Siff.	0.30	195.00	58.50
04/24/20	JZ	Review of internal pleading report circulated by S. Siff.	0.40	195.00	78.00
04/27/20	JZ	Review of internal pleading report circulated by S. Siff.	0.20	195.00	39.00
04/29/20	JZ	Review of internal pleading report circulated by S. Siff.	0.30	195.00	58.50
04/30/20	JZ	Review of internal pleading report circulated by S. Siff.	0.40	195.00	78.00

PROMESA - Official Committee of Unsecured Creditors
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Subtotal: B110 / Case Administration			13.70		\$3,013.50
B113 / Pleadings Review					
04/01/20	SS	Review and Analyze all court filings in the Main Case, Title III cases and Adversary Proceedings from late March 31 in order to prepare digest of matters relevant to special litigation counsel and distribute to appropriate team members. Continuously searched dockets to identify any filings needing immediate circulation.	1.20	195.00	234.00
04/01/20	SS	Prepare digest of matters and filings from late on March 31 relevant to special litigation counsel and distribute to appropriate team members.	0.60	195.00	117.00
04/01/20	SS	Review and Analyze all court filings in the Main Case, Title III cases and Adversary Proceedings on April 1 in order to prepare digest of matters relevant to special litigation counsel and distribute to appropriate team members.	1.30	195.00	253.50
04/01/20	SS	Prepare digest of matters and filings on April 1 relevant to special litigation counsel and distribute to appropriate team members.	0.60	195.00	117.00
04/02/20	SS	Review and Analyze all court filings in the Main Case, Title III cases and Adversary Proceedings from late April 1 in order to prepare digest of matters relevant to special litigation counsel and distribute to appropriate team members.	0.80	195.00	156.00
04/02/20	SS	Prepare digest of matters and filinfs from late on April 1 relevant to special litigation counsel and distribute to appropriate team members.	0.80	195.00	156.00
04/02/20	SS	Review and Analyze all court filings in the Main Case, Title III cases and Adversary Proceedings on April 2 in order to prepare digest of matters relevant to special litigation counsel and distribute to appropriate team members. Continuously reviewed dockets for filings that merit immediate circulation	0.90	195.00	175.50
04/02/20	SS	Prepare digest of matters relevant to special litigation counsel and distribute to appropriate team members.	0.70	195.00	136.50
04/03/20	SS	Review and Analyze all court filings in the Main Case, Title III cases and Adversary Proceedings from late on April 2 in order to prepare digest of matters relevant to special litigation counsel and distribute to appropriate team members.	0.80	195.00	156.00
04/03/20	SS	Prepare digest of matters and filings from late on April 2 relevant to special litigation counsel and distribute to appropriate team members.	0.70	195.00	136.50
04/03/20	SS	Review and Analyze all court filings in the Main Case, Title III cases and Adversary Proceedings on April 3 in order to prepare digest of matters relevant to special litigation counsel and distribute to appropriate team members. Continuously checked dockets to identify filings requiring immediate circulation.	0.90	195.00	175.50

PROMESA - Official Committee of Unsecured Creditors
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04/03/20	SS	Prepare digest of matters and filings on April 3 relevant to special litigation counsel and distribute to appropriate team members.	0.60	195.00	117.00
04/06/20	SS	Review and Analyze all court filings in the Main Case, Title III cases and Adversary Proceedings from late on April 3 through April 5 in order to prepare digest of matters relevant to special litigation counsel and distribute to appropriate team members.	0.80	195.00	156.00
04/06/20	SS	Prepare digest of matters and filings from late on April 3 through April 5 relevant to special litigation counsel and distribute to appropriate team members.	0.70	195.00	136.50
04/06/20	SS	Review and Analyze all court filings in the Main Case, Title III cases and Adversary Proceedings on April 6 in order to prepare digest of matters relevant to special litigation counsel and distribute to appropriate team members.	0.80	195.00	156.00
04/06/20	SS	Prepare digest of matters and filings on April 6 relevant to special litigation counsel and distribute to appropriate team members.	0.60	195.00	117.00
04/07/20	SS	Review and Analyze all court filings from late on April 6 in the Main Case, Title III cases and Adversary Proceedings in order to prepare digest of matters relevant to special litigation counsel and distribute to appropriate team members.	1.10	195.00	214.50
04/07/20	SS	Prepare digest of matters and filings from late on April 6 relevant to special litigation counsel and distribute to appropriate team members.	0.70	195.00	136.50
04/07/20	SS	Review and Analyze all court filings on April 7 in the Main Case, Title III cases and Adversary Proceedings in order to prepare digest of matters relevant to special litigation counsel and distribute to appropriate team members.	1.10	195.00	214.50
04/07/20	SS	Prepare digest of matters and filings on April 7 relevant to special litigation counsel and distribute to appropriate team members.	0.90	195.00	175.50
04/08/20	SS	Review and Analyze all court filings from late on April 7 in the Main Case, Title III cases and Adversary Proceedings in order to prepare digest of matters relevant to special litigation counsel and distribute to appropriate team members.	0.80	195.00	156.00
04/08/20	SS	Prepare digest of matters and filings from late on April 7 relevant to special litigation counsel and distribute to appropriate team members.	0.80	195.00	156.00
04/08/20	SS	Review and Analyze all court filings on April 8 in the Main Case, Title III cases and Adversary Proceedings in order to prepare digest of matters relevant to special litigation counsel and distribute to appropriate team members. Continuously monitored daily filings	0.90	195.00	175.50
04/08/20	SS	Prepare digest of matters and filings on April 8 relevant to special litigation counsel and distribute to appropriate team members.	0.60	195.00	117.00

PROMESA - Official Committee of Unsecured Creditors
12272-001
Invoice No. 98308

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04/09/20	SS	Review and Analyze all court filings from late April 8 in the Main Case, Title III cases and Adversary Proceedings in order to prepare digest of matters relevant to special litigation counsel and distribute to appropriate team members.	0.80	195.00	156.00
04/09/20	SS	Prepare digest of matters and filings from late on April 8 relevant to special litigation counsel and distribute to appropriate team members.	0.70	195.00	136.50
04/09/20	SS	Review and Analyze all court filing on April 9 in the Main Case, Title III cases and Adversary Proceedings and prepare digest of matters relevant to special litigation counsel in order to distribute to appropriate team members.	0.80	195.00	156.00
04/09/20	SS	Prepare digest of matters and filings on April 9 relevant to special litigation counsel and distribute to appropriate team members.	0.70	195.00	136.50
04/10/20	SS	Review and Analyze all court filings from late on April 9 in the Main Case, Title III cases and Adversary Proceedings in order to prepare digest of matters relevant to special litigation counsel and distribute to appropriate team members.	1.10	195.00	214.50
04/10/20	SS	Prepare digest of matters and filings from late on April 9 relevant to special litigation counsel and distribute to appropriate team members.	0.80	195.00	156.00
04/10/20	SS	Review and Analyze all court filings on April 10 in the Main Case, Title III cases and Adversary Proceedings in order to prepare digest of matters relevant to special litigation counsel and distribute to appropriate team members.	1.20	195.00	234.00
04/10/20	SS	Prepare digest of matters and filings on April 10 relevant to special litigation counsel and distribute to appropriate team members.	0.80	195.00	156.00
04/13/20	SS	Review and Analyze all court filings from late on April 10 through April 12 in the Main Case, Title III cases and Adversary Proceedings in order to prepare digest of matters relevant to special litigation counsel and distribute to appropriate team members.	1.30	195.00	253.50
04/13/20	SS	Prepare digest of matters and filings from Late on April 10 through April 12 relevant to special litigation counsel and distribute to appropriate team members.	0.60	195.00	117.00
04/13/20	SS	Review and Analyze all court filings on April 13 in the Main Case, Title III cases and Adversary Proceedings in order to prepare digest of matters relevant to special litigation counsel and distribute to appropriate team members.	1.10	195.00	214.50
04/13/20	SS	Prepare digest of matters and filings on April 13 relevant to special litigation counsel and distribute to appropriate team members.	0.70	195.00	136.50

PROMESA - Official Committee of Unsecured Creditors
12272-001
Invoice No. 98308

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04/14/20	SS	Review and Analyze all court filings from late on April 13 in the Main Case, Title III cases and Adversary Proceedings in order to prepare digest of matters relevant to special litigation counsel and distribute to appropriate team members.	0.80	195.00	156.00
04/14/20	SS	Prepare digest of matters and filings from late on April 13 relevant to special litigation counsel and distribute to appropriate team members.	0.70	195.00	136.50
04/14/20	SS	Review and Analyze all court filings on April 14 in the Main Case, Title III cases and Adversary Proceeding in order to prepare digest of matters relevant to special litigation counsel and distribute to appropriate team members.	0.90	195.00	175.50
04/14/20	SS	Prepare digest of matters and filings on April 14 relevant to special litigation counsel and distribute to appropriate team members.	0.80	195.00	156.00
04/15/20	SS	Review and Analyze all court filings in the Main Case, Title III cases and Adversary Proceedings from late on April 14 in order to prepare digest of matters relevant to special litigation counsel and distribute to appropriate team members.	0.90	195.00	175.50
04/15/20	SS	Prepare digest of matters and filings from late on April 14 relevant to special litigation counsel and distribute to appropriate team members.	0.70	195.00	136.50
04/15/20	SS	Review and Analyze all court filings on April 15 in the Main Case, Title III cases and Adversary Proceedings in order to prepare digest of matters relevant to special litigation counsel and distribute to appropriate team members.	1.10	195.00	214.50
04/15/20	SS	Prepare digest of matters and filings on April 15 relevant to special litigation counsel and distribute to appropriate team members.	0.80	195.00	156.00
04/16/20	SS	Review and Analyze all court filings from late on April 15 in the Main Case, Title III cases and Adversary Proceedings in order to prepare digest of matters relevant to special litigation counsel and distribute to appropriate team members.	0.70	195.00	136.50
04/16/20	SS	Prepare digest of matters and filings from late on April 15 relevant to special litigation counsel and distribute to appropriate team members.	0.60	195.00	117.00
04/16/20	SS	Review and Analyze all court filings on April 16 in the Main Case, Title III cases and Adversary Proceedings in order to prepare digest of matters relevant to special litigation counsel and distribute to appropriate team members.	0.90	195.00	175.50
04/16/20	SS	Prepare digest of matters and filings on April 16 relevant to special litigation counsel and distribute to appropriate team members.	0.60	195.00	117.00
04/16/20	SS	Review docket to determine what matters are scheduled for April 22 Omnibus Hearing, as requested by John Arrastia.	0.70	195.00	136.50

PROMESA - Official Committee of Unsecured Creditors
12272-001
Invoice No. 98308

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04/17/20	SS	Review and Analyze all court filings late on April 16 in the Main Case, Title III cases and Adversary Proceedings in order to prepare digest of matters relevant to special litigation counsel and distribute to appropriate team members.	0.90	195.00	175.50
04/17/20	SS	Prepare digest of matters and filings from late on April 16 relevant to special litigation counsel and distribute to appropriate team members.	0.60	195.00	117.00
04/17/20	SS	Review and Analyze all court filings on April 17 in the Main Case, Title III cases and Adversary Proceedings in order to prepare digest of matters relevant to special litigation counsel and distribute to appropriate team members.	1.20	195.00	234.00
04/17/20	SS	Prepare digest of matters and filings on April 17 relevant to special litigation counsel and distribute to appropriate team members.	0.70	195.00	136.50
04/17/20	SS	Review dockets to confirm that April 22 Omnibus hearing was proceeding. Email to JArrastia re same.	0.60	195.00	117.00
04/20/20	SS	Review and Analyze all court filings from late on April 17 through 19 in the Main Case, Title III cases and Adversary Proceedings in order to prepare digest of matters relevant to special litigation counsel and distribute to appropriate team members.	0.90	195.00	175.50
04/20/20	SS	Prepare digest of matters and filings from late on April 17 through April 19 relevant to special litigation counsel and distribute to appropriate team members.	0.70	195.00	136.50
04/20/20	SS	Review and Analyze all court filings on April 20 in the Main Case, Title III cases and Adversary Proceedings in order to prepare digest of matters relevant to special litigation counsel and distribute to appropriate team members.	1.30	195.00	253.50
04/20/20	SS	Prepare digest of matters and filings on April 20 relevant to special litigation counsel and distribute to appropriate team members.	0.70	195.00	136.50
04/21/20	SS	Review and Analyze all court filings from late on April 20 in the Main Case, Title III cases and Adversary Proceedings in order to prepare digest of matters relevant to special litigation counsel and distribute to appropriate team members.	0.80	195.00	156.00
04/21/20	SS	Prepare digest of matters and filings from late on April 20 relevant to special litigation counsel and distribute to appropriate team members.	0.60	195.00	117.00
04/21/20	SS	Review and Analyze all court filings on April 21 in the Main Case, Title III cases and Adversary Proceedings in order to prepare digest of matters relevant to special litigation counsel and distribute to appropriate team members.	0.90	195.00	175.50
04/21/20	SS	Prepare digest of matters and filings on April 21 relevant to special litigation counsel and distribute to appropriate team members.	0.80	195.00	156.00

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04/22/20	SS	Review and Analyze all court filings from late on April 21 in the Main Case, Title III cases and Adversary Proceedings in order to prepare digest of matters relevant to special litigation counsel and distribute to appropriate team members.	0.90	195.00	175.50
04/22/20	SS	Prepare digest of matters and filings from late on April 21 relevant to special litigation counsel and distribute to appropriate team members.	0.80	195.00	156.00
04/22/20	SS	Review and Analyze all court filings on April 22 in the Main Case, Title III cases and Adversary Proceedings in order to prepare digest of matters relevant to special litigation counsel and distribute to appropriate team members.	1.10	195.00	214.50
04/22/20	SS	Prepare digest of matters and filings relevant to special litigation counsel and distribute to appropriate team members.	0.80	195.00	156.00
04/23/20	SS	Review and Analyze all court filings from late on April 22 in the Main Case, Title III cases and Adversary Proceedings and prepare digest of matters relevant to special litigation counsel and distribute to appropriate team members.	0.90	195.00	175.50
04/23/20	SS	Prepare digest of matters and filings from late on April 22 relevant to special litigation counsel and distribute to appropriate team members.	0.60	195.00	117.00
04/23/20	SS	Prepare digest of matters and filings on April 23 relevant to special litigation counsel and distribute to appropriate team members.	0.80	195.00	156.00
04/23/20	SS	Review and Analyze all court filings on April 23 in the Main Case, Title III cases and Adversary Proceedings in order to prepare digest of matters relevant to special litigation counsel and distribute to appropriate team members.	1.90	195.00	370.50
04/24/20	SS	Review and Analyze all court filings from late on April 23 in the Main Case, Title III cases and Adversary Proceedings in order to prepare digest of matters relevant to special litigation counsel and distribute to appropriate team members.	0.80	195.00	156.00
04/24/20	SS	Prepare digest of matters and filings from late on April 23 relevant to special litigation counsel and distribute to appropriate team members.	0.70	195.00	136.50
04/24/20	SS	Review and Analyze all court filings on April 24 in the Main Case, Title III cases and Adversary Proceedings in order to prepare digest of matters relevant to special litigation counsel and distribute to appropriate team members.	0.80	195.00	156.00
04/24/20	SS	Prepare digest of matters and filings on April 24 relevant to special litigation counsel and distribute to appropriate team members.	0.90	195.00	175.50
04/27/20	SS	Review and Analyze all court filings in the Main Case, Title III cases and Adversary Proceedings from late on April 24 through April 26 in order to prepare digest of matters relevant to special litigation counsel and distribute to appropriate team members.	0.90	195.00	175.50

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04/27/20	SS	Prepare digest of matters and filings from late April 24 through April 26 relevant to special litigation counsel and distribute to appropriate team members.	0.40	195.00	78.00
04/27/20	SS	Review and Analyze all court filings in the Main Case, Title III cases and Adversary Proceedings on April 27 in order to prepare digest of matters relevant to special litigation counsel and distribute to appropriate team members.	0.90	195.00	175.50
04/27/20	SS	Prepare digest of matters and filings on April 27 relevant to special litigation counsel and distribute to appropriate team members.	0.70	195.00	136.50
04/28/20	SS	Review and Analyze all court filings from late on April 27 in the Main Case, Title III cases and Adversary Proceedings in order to prepare digest of matters relevant to special litigation counsel and distribute to appropriate team members.	0.90	195.00	175.50
04/28/20	SS	Prepare digest of matters and filings from late on April 27 relevant to special litigation counsel and distribute to appropriate team members.	0.80	195.00	156.00
04/28/20	SS	Review and Analyze all court filings in the Main Case, Title III cases and Adversary Proceedings on April 28 in order to prepare digest of matters relevant to special litigation counsel and distribute to appropriate team members.	1.00	195.00	195.00
04/28/20	SS	Prepare digest of matters and filings on April 28 relevant to special litigation counsel and distribute to appropriate team members.	0.70	195.00	136.50
04/29/20	SS	Review and Analyze all court filings from late on April 28 in the Main Case, Title III cases and Adversary Proceedings in order to prepare digest of matters relevant to special litigation counsel and distribute to appropriate team members.	0.90	195.00	175.50
04/29/20	SS	Prepare digest of matters and filings late on April 28 relevant to special litigation counsel and distribute to appropriate team members.	0.80	195.00	156.00
04/29/20	SS	Review and Analyze all court filings on April 29 in the Main Case, Title III cases and Adversary Proceedings in order to prepare digest of matters relevant to special litigation counsel and distribute to appropriate team members.	0.60	195.00	117.00
04/29/20	SS	Prepare digest of matters and filings on April 29 relevant to special litigation counsel and distribute to appropriate team members.	0.80	195.00	156.00
04/30/20	SS	Review and Analyze all court filings from late on April 29 in the Main Case, Title III cases and Adversary Proceedings in order to prepare digest of matters relevant to special litigation counsel and distribute to appropriate team members.	0.60	195.00	117.00
04/30/20	SS	Prepare digest of matters and filings from late on April 29 relevant to special litigation counsel and distribute to appropriate team members.	0.60	195.00	117.00

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04/30/20	SS	Review and Analyze all court filings on April 30 in the Main Case, Title III cases and Adversary Proceedings in order to prepare digest of matters relevant to special litigation counsel and distribute to appropriate team members.	0.90	195.00	175.50
04/30/20	SS	Prepare digest of matters and filings on April 30 relevant to special litigation counsel and distribute to appropriate team members.	0.80	195.00	156.00
Subtotal: B113 / Pleadings Review			74.50		\$14,527.50
B160 / Fee/Employment Applications					
04/01/20	MGG	Review January Fee Statement and prepare email for service on Notice Parties with summary of fees invoiced.	0.30	575.00	172.50
04/01/20	MGG	Correspondence from Valerie Blay Soler with Hacienda Communication and registration for electronic payments (.20). Review communication and website (.30). Emails to and from Ms. Soler (.10). Communications with John Arrastia (.10).	0.70	575.00	402.50
04/01/20	CBH	Attention to additional fee application deadlines; calendar.	0.30	195.00	58.50
04/06/20	MGG	Email to and from C. Esser and Valerie Blay Soler re: amounts due for November / December invoices.	0.10	575.00	57.50
04/06/20	MGG	Emails to and from Valerie Blay Soler re: registration for online payments (.10). Emails to and from John Arrastia and Ken Forrest re: same (.20).	0.30	575.00	172.50
04/06/20	JA	Review fee statements and revise in conformity with Fee Examiner guidelines (.6); address La Hacienda Supplier payment system registration (1.3).	1.90	575.00	1,092.50
04/06/20	CE	Multiple e-mails with V. Blay Soler re: December Fee Statement. Attention to December invoices.	0.20	150.00	30.00
04/07/20	MGG	Correspondence with C. Esser and Valerie Blay Soler re: clarifications to December Fee Statement.	0.30	575.00	172.50
04/10/20	JA	Review and revise fee statements in conformity with guidelines.	0.70	575.00	402.50
04/13/20	MGG	Review and approve letter requesting payment of January Fee Statement.	0.10	575.00	57.50
04/13/20	MGG	Review Fee Examiner Communication Letter Report re: Second Interim application and email to John Arrastia with comments.	0.40	575.00	230.00
04/13/20	CE	Prepare GJB Monthly Fee Objection Letter for January; e-mail correspondence with M. Guitian.	0.40	150.00	60.00
04/14/20	MGG	Confer with C. Esser re: service of GJB Monthly Fee Objection Statement. Review and approve.	0.10	575.00	57.50
04/14/20	CE	Finalize and serve GJB's Monthly Fee Objection Letter for January payment; e-mail correspondence with M. Guitian re: same.	0.40	150.00	60.00

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04/15/20	MGG	Review Fee Examiner's supplemental Report and Status Report on Uncontested Professional Fee Applications Recommended For Court Approval and continuance of GJB Fee Application to June 3, 2020.	0.10	575.00	57.50
04/15/20	JZ	Receipt and review of Supplemental Report of the Fee Examiner with respect to the professionals' fee and expense applications; calendar new hearing date; update electronic case profile.	0.40	195.00	78.00
04/16/20	MGG	Email to and from John Arrastia re: interim fee schedule.	0.20	575.00	115.00
04/28/20	JA	Attention to reviewing and revising fee statements in conformity with Fee Examiner's requirements.	0.60	575.00	345.00
04/30/20	MGG	Email to and from John Arrastia re: January invoice payments and tax withholding. Review tax withholding bill.	0.40	575.00	230.00
04/30/20	JA	Attention to 29% withholding by Commonwealth on Off-Island Professional Services; confer with Juan Casillas; confer with Alex Bogarts.	1.20	575.00	690.00
Subtotal: B160 / Fee/Employment Applications			9.10		\$4,541.50
B161 / Budgeting					
04/01/20	JHG	Review revised GJB budget regarding additional areas of focus.	0.60	765.00	459.00
04/20/20	JA	Prepare budget.	0.60	575.00	345.00
04/20/20	MGG	Follow up with J. Arrastia re: May Budget. Review draft Budget and email from J. Arrastia with explanation of adjustments.	0.30	575.00	172.50
04/22/20	MGG	Email from J. Arrastia re: approval of May Budget.	0.10	575.00	57.50
Subtotal: B161 / Budgeting			1.60		\$1,034.00
B165 / Fee-Employment Other Professionals					
04/03/20	MGG	Email to and from Jose Cartaya re: approval of fee statement invoices.	0.10	575.00	57.50
04/09/20	MGG	Email to Jose Cartaya re: approval of Fees by Committee for November and December.	0.20	575.00	115.00
Subtotal: B165 / Fee-Employment Other Professionals			0.30		\$172.50
B170 / Fee/Employment Objections					
04/13/20	JA	Review correspondence from Fee Examiner.	0.60	575.00	345.00
04/14/20	JA	Confer with W, Hahn of fee examiner's office.	0.60	575.00	345.00

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04/17/20	JA	Review and analyze fee examiner correspondence and prepare response.	4.70	575.00	2,702.50
04/20/20	JA	Review correspondence from Fee Examiner (.4); prepare and finalize correspondence to Fee Examiner (.8)	1.20	575.00	690.00
04/23/20	MGG	Review email and comments from Nicholas Hahn with regard to GJB's Second Interim Fee Application.	0.10	575.00	57.50
04/23/20	JA	Email correspondence with Fee Examiner.	0.10	575.00	57.50
Subtotal: B170 / Fee/Employment Objections			7.30		\$4,197.50
B191 / General Litigation					
04/01/20	JHG	Review email from M. Friedman and revised outline regarding [REDACTED]	1.70	765.00	1,300.50
04/01/20	JHG	Review daily summary from S. Siff to identify and analyze strategic litigation issues.	0.40	765.00	306.00
04/01/20	JHG	Review ECF 12569, motion directing withdrawal of complaint.	0.50	765.00	382.50
04/01/20	JHG	Review Doc. 64 in 19-05523, informative motion regarding publication of claims bar date.	0.40	765.00	306.00
04/01/20	JA	Confer with client regarding litigation strategy.	0.30	575.00	172.50
04/01/20	JA	Confer with financial advisor regarding Plan aspects (.7); review additional litigation strategy comments to draft of litigation plan (.6); strategize with J. Suarez regarding litigation strategy (.4); strategize with J. Genovese regarding potential plan challenge strategies (.4); continued attention to preparation of litigation strategy and plan (1.2)	3.30	575.00	1,897.50
04/01/20	JMS	Review of issues relating to stay orders and import to GJB-responsible litigation matters (2.4); attention to revised plan of adjustment and issues related to confirmation objections (1.6)	4.00	500.00	2,000.00
04/01/20	AMC	Attend to communications concerning disclosure statement analysis.	0.20	375.00	75.00
04/01/20	AMC	Analyzed and developed strategy concerning practical effect of [REDACTED]	0.80	375.00	300.00
04/01/20	AMC	Conduct substantial research concerning the mechanics of a [REDACTED]	3.20	375.00	1,200.00
04/01/20	JAD	Analysis of impact on voting for Chapter 11 plan for [REDACTED]	2.70	315.00	850.50
04/01/20	EJ	Continued legal research and drafting of analysis of facts which support [REDACTED].	4.20	475.00	1,995.00

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04/01/20	JZ	Receipt and review of Court's Order on the Debtors' Amended Motion for Entry of an Order (a) Authorizing Alternative Dispute Resolution Procedures, (b) Approving Additional Forms of Notice, and (c) Granting Related Relief; update electronic case profile.	0.20	195.00	39.00
04/02/20	JHG	Review emails from E. Jacobs and continued research regarding [REDACTED]	1.20	765.00	918.00
04/02/20	JA	Confer with Eric Jacobs regarding legal research (.5); strategize with J. Genovese regarding [REDACTED] (1.2); review and analyze memorandum regarding Plan classifications (1.6); review Answer in AP 359 (.3); review legal research and analysis regarding anticipated legal issues (.6); research and analyze case plan classification issues (1.6).	5.80	575.00	3,335.00
04/02/20	JMS	Continued research into subordination remedies (1.8); analysis of related plan provisions (1.4)	3.20	500.00	1,600.00
04/02/20	AMC	Conference call to discuss potential appellate recourse.	0.30	375.00	112.50
04/02/20	AMC	Undertake exhaustive review and analysis of provisions of the plan and disclosure statement, with particular reference to [REDACTED]	3.80	375.00	1,425.00
04/02/20	AMC	Make substantial revisions to research memorandum / analysis concerning [REDACTED]	5.30	375.00	1,987.50
04/02/20	JAD	Analysis of Financial Oversight and Management Board's fiduciary duty to the Commonwealth and/or to creditors.	1.20	315.00	378.00
04/02/20	JAD	Initial analysis of potential causes of action against Oversight Board.	0.80	315.00	252.00
04/02/20	EJ	Continued legal research of [REDACTED] (3.6). Prepare for and participate in telephone conference with John Arrastia and John Genovese (1.1).	4.70	475.00	2,232.50
04/02/20	JZ	Receipt and review of the Urgent Consensual Motion Of The FOMB and the UCC for an Extension of Briefing Deadlines Pursuant to Federal Rule of Bankruptcy Procedure 3013 for Entry of an Order Reclassifying Class 39A and Class 41 Claims Under Oversight Board's Plan of Adjustment [ECF No. 12625]; circulate same; update electronic case profile.	0.40	195.00	78.00
04/03/20	JHG	Review email from A. Castaldi and analysis of [REDACTED]	1.70	765.00	1,300.50
04/03/20	JHG	Review ECF 12625, joint urgent motion for extension of briefing deadline.	0.30	765.00	229.50
04/03/20	JHG	Review and analysis of email from Alex Bongartz regarding PREPA 9019 hearings.	0.40	765.00	306.00

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04/03/20	JHG	Review email from E. Jacobs regarding plan classification issues.	0.30	765.00	229.50
04/03/20	JHG	Research on classification issues.	1.30	765.00	994.50
04/03/20	JA	Review and analyze memorandum regarding [REDACTED] (.6); strategize with A. Castaldi regarding Plan and disclosure issues (.6); confer with financial advisor (.5); review financial analyst materials (.8); review Fifth Motion for Appeal of Stay (.1); analyze and strategize regarding disclosure statement issues (1.8); legal research and analysis regarding same (1.1); consider and analyze confirmation issues (.4)	5.90	575.00	3,392.50
04/03/20	JMS	Extensive research concerning [REDACTED] (1.4); review of plan of adjustment issues and call with financial advisers (1.2); work on litigation strategy concerning [REDACTED] (1.7)	4.30	500.00	2,150.00
04/03/20	AMC	Complete detailed research memorandum analyzing, inter alia, [REDACTED]	1.30	375.00	487.50
04/03/20	AMC	Conference call to discuss lien and lien avoidance issues under § 551 and 506(d).	0.60	375.00	225.00
04/03/20	AMC	Review and analyze [REDACTED]	1.40	375.00	525.00
04/03/20	AMC	Call with Scott Martinez and GJB team to discussion plan [REDACTED] pertaining thereto.	0.60	375.00	225.00
04/03/20	AMC	Analyze specific "avoidance actions" that would be subject to post-confirmation trust.	1.20	375.00	450.00
04/03/20	JAD	Analysis of memoranda regarding provisions of disclosure statement and plan.	0.70	315.00	220.50
04/03/20	JAD	Continued preparation of memorandum concerning [REDACTED]	3.80	315.00	1,197.00
04/03/20	JZ	Receipt and review Order Setting Briefing Schedule on the Urgent Consensual Motion Of The FOMB and the UCC for an Extension of Briefing Deadlines Pursuant to Federal Rule of Bankruptcy Procedure 3013 for Entry of an Order Reclassifying Class 39A and Class 41 Claims Under Oversight Board's Plan of Adjustment; circulate same; calendar deadlines and hearing date; update electronic case profile.	0.30	195.00	58.50
04/03/20	JZ	Review of memorandum prepared by A. Castaldi regarding provisions of the disclosure statement and plan.	0.60	195.00	117.00
04/06/20	JHG	Review ECF 11947, disclosure statement.	3.80	765.00	2,907.00
04/06/20	JHG	Review daily summary from S. Siff to identify and analyze strategic litigation issues.	0.30	765.00	229.50

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04/06/20	JHG	Review ECF 12675, urgent motion by Commonwealth.	0.40	765.00	306.00
04/06/20	JHG	Review ECF 29 in 19-00453, order permitting joint status report, review email from J. Arrastia and issue of [REDACTED]	0.70	765.00	535.50
04/06/20	JA	Review strategy regarding classification issues (.3); legal research and analysis regarding [REDACTED] and remedies (1.4); strategize regarding litigation plan (1.2); analysis of [REDACTED] (1.7).	4.60	575.00	2,645.00
04/07/20	JHG	Review emails from J.P. Bado regarding [REDACTED]	2.20	765.00	1,683.00
04/07/20	JHG	Review ECF 12676, order adjourning hearing.	0.30	765.00	229.50
04/07/20	JHG	Continued analysis of [REDACTED].	1.30	765.00	994.50
04/07/20	JMS	Research publicly available information concerning promesa [REDACTED] (3.4); continued analysis of disclosure statement issues related to Underwriter Litigation (1.8)	5.20	500.00	2,600.00
04/07/20	JA	Review proposed correspondence (.3); legal research and analysis regarding [REDACTED] (1.4); strategize regarding [REDACTED] (.9); address [REDACTED] (1.8); revise litigation plan (.6); legal research and analysis regarding [REDACTED] (2.3)	7.30	575.00	4,197.50
04/07/20	JPB	Research Puerto Rico "priority norms" regarding payment of debt when the Commonwealth lacks the ability to pay.	1.10	375.00	412.50
04/07/20	JAD	Analysis and consideration of materials to be discussed during 4/8/20 conference call with John Arrastia and John Genovese.	0.60	315.00	189.00
04/07/20	AMC	Conference with John Arrastia and Irina Sadovnic.	0.20	375.00	75.00
04/07/20	AMC	Research and analyze recent federal bankruptcy court cases analyzing [REDACTED]	1.80	375.00	675.00
04/07/20	AMC	Analysis of PROMESA statute with respect to the extent to which, if any, PROMESA affected the [REDACTED]	1.10	375.00	412.50
04/07/20	JZ	Conference with J. Suarez regarding closely monitoring the UCC's 3013 motion; receipt and review of Assured's Joinder to the UCC's Motion Pursuant to Federal Rule of Bankruptcy Procedure 3013 for Entry of an Order Reclassifying Class 39A and Class 41 Claims under Oversight Board's Plan of Adjustment [ECF No. 12687]; receipt and review of Assured's Urgent Motion to Set Reply Deadline in respect to the 3013 motion [ECF No. 16288]; circulate filings; update electronic case profile.	0.70	195.00	136.50

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04/07/20	JZ	Receipt and review of Objection to the UCC's 3013 motion filed by AFSCME [ECF No. 12689]; circulate filing; update electronic case profile.	0.40	195.00	78.00
04/07/20	JZ	Receipt and review of Ambac Assurance Partial Joinder to the UCC's 3013 motion [ECF No. 12691]; circulate filing; update electronic case profile.	0.40	195.00	78.00
04/08/20	JHG	Review and analyze memorandum regarding issues for discussion.	1.10	765.00	841.50
04/08/20	JHG	Attend strategy call regarding [REDACTED]	0.90	765.00	688.50
04/08/20	JHG	Review and analyze issues in email from J. Suarez attaching draft letter to House Bill 2434 and review draft letter.	1.10	765.00	841.50
04/08/20	JHG	Review and analysis of email from Alex Bongartz regarding Committee meeting agenda and related documents.	0.70	765.00	535.50
04/08/20	JHG	Extensive review of [REDACTED]	1.30	765.00	994.50
04/08/20	JMS	Meeting concerning [REDACTED] (3.5); work on [REDACTED] (1.8)	5.30	500.00	2,650.00
04/08/20	JA	Revise litigation issue outline (.6); prepare memorandum of [REDACTED] (.6); prepare outline of [REDACTED] (.8); legal research and analysis regarding [REDACTED] (1.2); conduct strategy meeting with J. Genovese, A. Castaldi, J. Suarez and M. Friedman regarding pending litigation issues (2.1); analysis and research regarding [REDACTED] (1.3); review and analyze [REDACTED] (1.3)	7.90	575.00	4,542.50
04/08/20	JAD	Strategy conference call with John Arrastia and John Genovese.	1.80	315.00	567.00
04/08/20	AMC	Research concerning relationship between [REDACTED]	1.10	375.00	412.50
04/08/20	AMC	Review and analysis of Title III of PROMESA concerning [REDACTED]	1.10	375.00	412.50
04/08/20	AMC	Prepare for and attend global strategy conference with GJB team.	1.90	375.00	712.50
04/08/20	JZ	Update the PROMESA consolidated case list to include upcoming deadlines and status.	1.60	195.00	312.00

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04/08/20	JZ	Receipt and review of Order Granting the Urgent Motion of Assured Guaranty Corp., Assured Guaranty Municipal Corp., Invesco Funds, and Ambac Assurance Corporation to Set Reply Deadline with Respect to Motion of Official Committee of Unsecured Creditors Pursuant to Federal Rule of Bankruptcy Procedure 3013 for Entry of an Order Reclassifying Class 39A and Class 41 Claims Under Oversight Board's Plan of Adjustment; circulate same; calendar reply deadline; update electronic case profile.	0.30	195.00	58.50
04/08/20	JZ	Receipt and review of Objection to the Motion of the Official Committee of Unsecured Creditors (the "Creditors' Committee") pursuant to Federal Rule of Bankruptcy Procedure 3013 For Entry of An Order Reclassifying Class 39A and Class 41 Claims under Oversight Board's Plan of Adjustment dated February 28, 2020 (ECF 11989; the "Motion"), filed by American Federation of State, County and Municipal Employees International Union, AFL-CIO ("AFSCME") , on behalf of itself and its local affiliates; circulate same, update electronic case profile.	0.30	195.00	58.50
04/09/20	JHG	Continued review of [REDACTED]	2.80	765.00	2,142.00
04/09/20	JHG	Review and analysis of [REDACTED]	2.60	765.00	1,989.00
04/09/20	JMS	Research potential remedies associated with [REDACTED] (3.7); work on potential [REDACTED] (1.9)	5.60	500.00	2,800.00
04/09/20	JA	Research Confidentiality Order (.8); analyze legal research regarding [REDACTED] (1.3); analyze [REDACTED] (2.6); continued attention to [REDACTED] (1.2)	5.90	575.00	3,392.50
04/09/20	AMC	Analyze spreadsheets / internal memoranda evaluating historic [REDACTED]	0.60	375.00	225.00
04/09/20	JZ	Receipt and review of UCC's Reservation of Rights to object to the treatment of the CW BANs Claims under the Plan n connection with the PRIFA 9019 Motion [ECF No. 12705]; circulate same; update electronic case profile.	0.30	195.00	58.50
04/09/20	JZ	Receipt and review of Urgent Motion of The Official Committee of Retired Employees of the Commonwealth of Puerto Rico for an order (i) granting the Retiree Committee leave to file a supplemental opposition to joinders filed to the UCC's 3013 motion [ECF No. 12706]; circulate same; update electronic case profile.	0.40	195.00	78.00
04/10/20	JHG	Conference with J. Arrastia regarding [REDACTED]	0.80	765.00	612.00
04/10/20	JHG	Review plan and analysis outline prepared by Paul Hastings.	2.80	765.00	2,142.00
04/10/20	JHG	Review daily summary prepared by S. Siff to identify and analyze strategic litigation issues.	0.40	765.00	306.00

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04/10/20	JHG	Review and analysis of ECF 761, joint stipulation to identify stay deadlines.	0.60	765.00	459.00
04/10/20	JMS	Continued research concerning [REDACTED] (3.3); additional research concerning [REDACTED] (2.2)	5.50	500.00	2,750.00
04/10/20	JA	Review Retiree Committee Motion for Leave (.1); review outline of research items (.4); review pleadings and research regarding [REDACTED] (1.6); strategize regarding litigation strategy (.8)	2.90	575.00	1,667.50
04/10/20	AMC	Draft litigation plan and going-forward strategy for internal distribution and review.	2.40	375.00	900.00
04/10/20	AMC	Research concerning classification issues under § 1123 and Title III of PROMESA (§ 310(e)).	1.70	375.00	637.50
04/10/20	AMC	Review and analyze recent docket activity and filings concerning underwriter litigation, and pending litigation between ERS and UBS.	0.80	375.00	300.00
04/10/20	AMC	Review AFAAF publics concerning recently published fiscal report.	0.20	375.00	75.00
04/11/20	JA	Analyze [REDACTED] (2.1); research and analyze [REDACTED] (1.3)	3.40	575.00	1,955.00
04/11/20	JAD	Conference with Angelo Castaldi concerning [REDACTED]	0.30	315.00	94.50
04/11/20	AMC	Research of bankruptcy and statutory authorities [REDACTED]	3.30	375.00	1,237.50
04/12/20	JA	Analyze research issues (1.1); revise disclosures relating to mediation (.8); strategize regarding research and litigation plan (2.6)	4.50	575.00	2,587.50
04/12/20	AMC	Detailed review, analysis, summary, and development of internal spreadsheet memorandum concerning [REDACTED]	6.40	375.00	2,400.00
04/13/20	JHG	Review email from Alex Bongartz and attached media, and analysis of First Circuit opinion and assessment of issues affecting pending on expected litigation.	1.10	765.00	841.50
04/13/20	JHG	Reviewed email from S. Siff and review ERS order.	0.30	765.00	229.50
04/13/20	JHG	Attend conference call with J. Arrastia regarding [REDACTED]	0.70	765.00	535.50
04/13/20	JHG	Review email from Nora Hafey and attached motion regarding Ambac complaint.	0.60	765.00	459.00

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04/13/20	JHG	Review and analyze daily summary from S. Siff to identify and analyze strategic litigation issues.	0.80	765.00	612.00
04/13/20	JHG	Review ECF 12713, Order regarding Ambac discovery requests.	0.40	765.00	306.00
04/13/20	JHG	Review and analyze ECF 1215, Court Order following joint status report.	0.30	765.00	229.50
04/13/20	JHG	Review and analyze ECF 77 in 19-00359, regarding extension of time.	0.30	765.00	229.50
04/13/20	JHG	Review and analyze UCC reservation of rights regarding 3013 classifications.	1.30	765.00	994.50
04/13/20	JHG	Review and analyze ECF 12726, opposition regarding 3013.	1.10	765.00	841.50
04/13/20	JA	Confer with financial advisor regarding [REDACTED] and [REDACTED] (.6); [REDACTED] (2.1); review QTCB Motion to Reclassify Claims as it relates to [REDACTED] (conflict with PH) (.2); review opposition of FOMB regarding 3013 as it relates to [REDACTED] (conflict with PH) (.6); review legal research regarding [REDACTED] (.6); analyze issues relating to [REDACTED] (1.2); strategy call on [REDACTED] with J. Genovese, J. Suarez; M. Friedman and A. Castaldi (1.0).	6.30	575.00	3,622.50
04/13/20	JA	Call with Alvin Velazquez regarding use strategy (1.2); review Committee communications (.2)	1.40	575.00	805.00
04/13/20	JMS	Analysis of procedural options concerning [REDACTED] (2.5)	2.50	500.00	1,250.00
04/13/20	JAD	Analysis of [REDACTED]	3.20	315.00	1,008.00
04/13/20	AMC	Revise internal working memorandum concerning [REDACTED]	1.30	375.00	487.50
04/13/20	AMC	Review, analyze, and summarize time entries of professionals regarding mediation and PSA negotiations.	4.80	375.00	1,800.00
04/13/20	AMC	Conference call with GJB-PROMESA team.	1.10	375.00	412.50
04/13/20	AMC	Continued development of strategy concerning [REDACTED]	1.40	375.00	525.00

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04/13/20	JZ	Receipt and review of Order Granting Receipt and review of Urgent Motion of The Official Committee of Retired Employees of the Commonwealth of Puerto Rico for an order (i) granting the Retiree Committee leave to file a supplemental opposition to joinders filed to the UCC's 3013 motion [ECF No. 12708]; circulate same; calendar opposition deadline; update eletronic case profile.	0.30	195.00	58.50
04/13/20	JZ	Receipt and review of National Public Finance Guarantee Corporation's Reservation of Rights re: UCC's 3013 Motion [ECF 12718] ; circulate same; update electronic case profile.	0.30	195.00	58.50
04/13/20	JZ	Receipt and review of QTCB Noteholder Group's Objection to UCC's 3013 Motion [ECF No. 12723]; circulate same; update electronic case profile.	0.40	195.00	78.00
04/13/20	JZ	Receipt and review of LCDC's Objection to UCC's 3013 Motion [ECF No. 12724]; circulate same; update electronic case profile.	0.40	195.00	78.00
04/13/20	JZ	Receipt and review of FOMB's Objection to UCC's 3013 Motion [ECF No. 12725]; circulate same; update electronic case profile.	0.40	195.00	78.00
04/13/20	JZ	Receipt and review of Retiree Committee's Supplemental Objection to UCC's 3013 Motion and Ambac's Joinder [ECF No. 12725]; circulate same; update electronic case profile.	0.40	195.00	78.00
04/14/20	JHG	Review and analyze ECF 12725, supplemental objection of Retiree Committee to Ambac partial joinder.	1.40	765.00	1,071.00
04/14/20	JHG	Review and analyze daily summary prepared by S. Siff to identify and analyze strategic litigation issues.	0.80	765.00	612.00
04/14/20	JHG	Review ECF 12720, Order granting agreed omnibus order.	0.30	765.00	229.50
04/14/20	JHG	Review ECF 12722, Order establishing omnibus hearing procedures.	0.40	765.00	306.00
04/14/20	JHG	Review and analyze ECF 12723, objection to UCC motion filed by QTCB Noteholder Group.	0.80	765.00	612.00
04/14/20	JHG	Review and analyze ECF 12724, objection to LCDC to UCC 3013 motion.	1.90	765.00	1,453.50
04/14/20	JHG	Review and analyze ECF 12726, FOMB opposition to UCC 3013 motion.	1.70	765.00	1,300.50
04/14/20	JHG	Review ECF 12748, Court scheduling Order modifying hearing date and deadlines.	0.30	765.00	229.50
04/14/20	JA	Strategize regarding potential claims [REDACTED] (1.6); review and create data spreadsheets and visual representation of [REDACTED] (1.2); review and analyze [REDACTED] (1.1)	3.90	575.00	2,242.50

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04/14/20	AMC	Research concerning applicable standards governing adequacy of disclosures within disclosure statement under s. 1125.	0.60	375.00	225.00
04/14/20	AMC	Research concerning [REDACTED]	4.20	375.00	1,575.00
04/14/20	AMC	Conduct substantial research concerning [REDACTED]	3.30	375.00	1,237.50
04/14/20	AMC	Review of recent briefings regarding Committee's Rule 3013 motion.	0.60	375.00	225.00
04/14/20	AMC	Compare differences in statutory priorities under Chapter 11 and Chapter 9.	0.80	375.00	300.00
04/14/20	AMC	Review of built-in priorities under PROMESA.	0.40	375.00	150.00
04/14/20	AMC	Attend to internal GJB team communications concerning going-forward litigation strategy.	0.40	375.00	150.00
04/14/20	JZ	Receipt and review of Assured's Motion to Exceed Page Limit to File Joint reply Brief in Support of 3013 Motion; circulate same; update electronic case profile.	0.20	195.00	39.00
04/15/20	JHG	Review S. Siff daily memorandum to identify and analyze strategic litigation issues.	0.60	765.00	459.00
04/15/20	JHG	Review and analyze ECF 12774, Court Order granting Assured urgent motion.	0.30	765.00	229.50
04/15/20	JHG	Review ECF 12789, UCC motion to exceed page limitation.	0.30	765.00	229.50
04/15/20	JHG	Review ECF 12795, regarding motion for 362 relief.	0.20	765.00	153.00
04/15/20	JHG	Review ECF 12803, supplemental report of fee examiner regarding GJB.	1.10	765.00	841.50
04/15/20	JHG	Review and analysis of ECF 12811, joinder in motion filed by Ordinary Course Employees.	0.70	765.00	535.50
04/15/20	JHG	Review [REDACTED] (.2) and attend conference call (1.3)	1.50	765.00	1,147.50
04/15/20	JA	Strategize with J. Suarez, A. Castaldi; M. Friedman and J. Genovese (1.3); review and analyze PSA materials for contrast regarding [REDACTED] (2.1); review, analyze and [REDACTED] (1.7); additional legal research and analysis regarding [REDACTED] (1.1); review fee examiner report (.3)	6.50	575.00	3,737.50
04/15/20	JAD	Preparation of Memorandum regarding [REDACTED]	2.70	315.00	850.50

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04/15/20	AMC	Cisco Webex conference with GJB team to discuss going-forward strategy re: GJB related litigation.	1.30	375.00	487.50
04/15/20	AMC	Research of First Circuit precedent concerning [REDACTED] [REDACTED]	2.10	375.00	787.50
04/15/20	JZ	Receipt and review of UCC's Motion seeking leave to exceed the page limit for memoranda of law in support of replies to 3013 motion; circulate same; update electronic case profile.	0.30	195.00	58.50
04/15/20	JZ	Receipt and review of Joinder and Statement in Support of the UCC's 3013 Motion filed by the Group of Creditors with Ordinary Course Employee Claims; circulate same; update electronic case profile.	0.30	195.00	58.50
04/16/20	JHG	Review email from J. Arrastia regarding issues regarding time entries and review fee examiner objection.	0.90	765.00	688.50
04/16/20	JHG	Review email from Alex Bongartz.	0.20	765.00	153.00
04/16/20	JHG	Review daily summary from S. Siff to identify and analyze strategic litigation issues.	0.40	765.00	306.00
04/16/20	JA	Review and analyze memorandum [REDACTED] [REDACTED] (1.4); review and analyze legal research and analysis regarding [REDACTED] [REDACTED] (1.1); review Committee reply to 3013 Motion as it relates to [REDACTED] [REDACTED] (6); review objection to UBS Lift Stay Motion and UBS in AP 280 + other litigation (6)	3.70	575.00	2,127.50
04/16/20	AMC	Review and revise research memorandum concerning [REDACTED] [REDACTED]	1.60	375.00	600.00
04/16/20	AMC	Research concerning standards applicable to [REDACTED] [REDACTED].	1.40	375.00	525.00
04/16/20	AMC	Review of Committee's reply in further support concerning the Committee's Rule 3013 motion.	0.40	375.00	150.00
04/17/20	JHG	Review summary prepared by S. Siff to identify and analyze litigation issues.	0.20	765.00	153.00
04/17/20	JHG	Review ECF 19 in 20-00047, stipulation and proposed order.	0.30	765.00	229.50
04/17/20	JHG	Review and analysis of ECF 12855, Order on joint summary report discovery and briefing issues.	0.60	765.00	459.00
04/17/20	JHG	Review response to fee examiner objections.	0.60	765.00	459.00

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04/17/20	JZ	Review of Court hearing calendar; attention to GO/BPA matters scheduled for hearing on April 30th pursuant to the Interim Case Management Order entered on 12/19/19 in Adversary cases 19-AP-280; 19-AP-281; 19-AP-282; 19-AP-283; 19-AP-288 and 19-AP-297; review of the December interim case management order and current Stay Order dated March 10, 2020; review of each case docket to confirm current stay order is applicable in each adversary case; conference with I. Sadovnic regarding stay in ADV 19-297 despite case not being listed in appendix in the March 10th stay order, as said adversary case was included in the interim order and referenced as stayed in the March 10th stay order, under the category GO Lien Challenge.	0.80	195.00	156.00
04/17/20	JZ	Receipt and review of UCC's Reply in further Support of its 3013 Motion [ECF No. 12872]; receipt and review of Assured's reply in further support of UCC's 3013 Motion [ECF No. 12871]; update electronic case profile.	0.60	195.00	117.00
04/19/20	JA	Analyze n [REDACTED]	0.60	575.00	345.00
04/20/20	JHG	Review email from J. Arrastia with budgeting update.	0.30	765.00	229.50
04/20/20	JHG	Review ECF 12883, Assured motion regarding omnibus hearing.	0.20	765.00	153.00
04/20/20	JHG	Review and analysis of email from Alex Bongartz.	0.40	765.00	306.00
04/20/20	JHG	Review email from S. Siff and attached agenda.	0.40	765.00	306.00
04/20/20	JHG	Review ECF 996, Order governing discovery and briefing in contested matters.	0.80	765.00	612.00
04/20/20	JHG	Review and analysis of summary of creditor working group call.	0.70	765.00	535.50
04/20/20	JHG	Review ECF 12882, UBS reply regarding stay issues and counterclaim.	0.80	765.00	612.00
04/20/20	JHG	Review ECF 126 in 18-00028, Coopertiva complaint.	0.90	765.00	688.50
04/20/20	JHG	Review research memorandum from A. Castaldi regarding [REDACTED]	0.60	765.00	459.00
04/20/20	JHG	Review emails regarding budgeting issues.	0.30	765.00	229.50
04/20/20	JHG	Review ECF 12890, UCC informative motion.	0.20	765.00	153.00
04/20/20	JMS	Continue review of litigation options [REDACTED]	1.80	500.00	900.00

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04/20/20	JA	Review AMBAC Reply regarding 3013 reclassification (.4); review [REDACTED] (.3); review agenda for Omnibus (.1); strategize regarding potential [REDACTED] (1.6)	3.40	575.00	1,955.00
04/20/20	AMC	Attend to internal communications concerning [REDACTED]	0.20	375.00	75.00
04/20/20	AMC	Review of the following documents: 12872 (REPLY to Response to Motion / Reply in Support of Motion of Official Committee of Unsecured Creditors Pursuant to Federal Rule of Bankruptcy Procedure 3013 for Entry of an Order Reclassifying Class 39a and Class 41 Claims Under Oversight Boards Plan of Adjustment Dated February 28, 2020), 12871 (REPLY to Response to Motion / Reply of Assured Guaranty Corp., Assured Guaranty Municipal Corp., and Invesco Funds in Further Support of Motion of Official Committee of Unsecured Creditors Pursuant to Federal Rule of Bankruptcy Procedure 3013 for Entry of an Order Reclassifying Class 39A and Class 41 Claims Under Oversight Boards Plan of Adjustment dated February 28, 2020), and 12873 (Supporting MOTION / Ambac Assurance Corporations Reply in Further Support of Partial Joinder to Motion of Official Committee of Unsecured Creditors Pursuant to Federal Rule of Bankruptcy Procedure 3013 for Entry of an Order Reclassifying Class 39A and Class 41 Claims Under Oversight Boards Plan of Adjustment Dated February 28, 2020).	1.30	375.00	487.50
04/20/20	AMC	Review / analysis of argument and Court reception of arguments in the Aurelius Management case before the Supreme Court, and review of briefings concerning potential post-Supreme Court mandate contingencies.	1.10	375.00	412.50
04/20/20	AMC	Research, using EMMA platform, concerning CUSIPs associated with 2012 and 2014 bond issuances.	1.20	375.00	450.00
04/20/20	JZ	Receipt and review of the Notice adjourning the hearing on the Motion for Relief from Automatic Stay filed by AMPR; calendar new hearing date; circulate same; update electronic case profile.	0.30	195.00	58.50
04/20/20	JZ	Receipt and review of Ambac Assurance Corporation's reply in further support of its Partial Joinder to UCC's 3013 Motion; circulate same; update electronic case profile.	0.30	195.00	58.50
04/20/20	JZ	Receipt and review of Order Adjourning Hearing on Ambac's Pensions Discovery Motions [ECF No. 12863]; calendar hearing date and compliance deadline; update electronic case profile.	0.30	195.00	58.50
04/20/20	JZ	Receipt and review of PBA's Motion for Entry of Order Extending Time for to Assume or Reject Unexpired Leases of Nonresidential Real Property [ECF No. 12857]; calendar hearing date and compliance deadline; update electronic case profile.	0.30	195.00	58.50

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04/20/20	JZ	Receipt and review of UCC's informative motion in response to the Court's Order Regarding Procedures for April 22, 2020 Omnibus Hearing; update electronic case profile.	0.20	195.00	39.00
04/21/20	JHG	Review and analysis of email from J. Suarez regarding [REDACTED] [REDACTED]	0.60	765.00	459.00
04/21/20	JHG	Review daily summary provided by S. Siff.	0.30	765.00	229.50
04/21/20	JHG	Review and extensive analysis of ECF 22 in 20-00047, plaintiff's motion to remand and memorandum.	1.30	765.00	994.50
04/21/20	JHG	Review daily summary received from S. Siff to identify and analyze strategic litigation issues.	0.40	765.00	306.00
04/21/20	JHG	Review ECF 12901, Order granting joint scheduling motion regarding IRS/Admin claims.	0.30	765.00	229.50
04/21/20	JHG	Review ECF 12910, status report of FOMB.	1.00	765.00	765.00
04/21/20	JMS	Review issues related to Rule 3013 Motions and arguments related to [REDACTED] [REDACTED]	2.40	500.00	1,200.00
04/21/20	JA	Confer and strategize with J. Suarez regarding [REDACTED] [REDACTED] (.3); confer with client regarding possible strategy issues (.6); formulate strategy regarding [REDACTED] [REDACTED] (2.3); review FOMB status (.3); attention to expiring tolling agreements (.2)	3.70	575.00	2,127.50
04/21/20	AMC	Telephone conference with John Arrastia to discuss use of mediation process concerning extant litigation issues.	0.20	375.00	75.00
04/21/20	AMC	Attend to telephone conference with Joyce Delgado concerning re-draft of internal memorandum, and review of options for purposes of drafting a global summary thereof.	0.20	375.00	75.00
04/21/20	AMC	Rule 2019 Analysis.	2.20	375.00	825.00
04/21/20	AMC	Review, analyze, and summarize: DE 12921 Motion to Inform Status Report of The Puerto Rico Fiscal Agency and Financial Advisory Authority Regarding the Government of Puerto Rico's Recent Activities in Response to the ongoing Covid-19 Pandemic; and DE 12920 Confidentiality Agreement and Order in Connection with (A) Ambac Assurance Corporation's Motion For Entry Of Order Authorizing Discovery Under Bankruptcy Rule 2004 Concerning Commonwealth Assets [ECF No. [9022]] and (B) Ambac Assurance Corporation's Motion or Entry Of Order Authorizing Discovery Under Bankruptcy Rule 2004 Concerning Commonwealth Cash Restriction Analysis.	0.60	375.00	225.00
04/21/20	AMC	Review, analyze, and summarize recently-filed fee application of professionals of certain interested parties.	1.20	375.00	450.00
04/21/20	AMC	Research of First Circuit authorities concerning scope of Rule 2004 discovery.	0.40	375.00	150.00

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04/21/20	JAD	Analysis of [REDACTED] [REDACTED]	3.50	315.00	1,102.50
04/21/20	JAD	Preparation of memorandum regarding [REDACTED] [REDACTED]	2.80	315.00	882.00
04/21/20	JNS	Tolling agreement follow up.	0.20	75.00	15.00
04/22/20	JHG	Review ECF 23 in 20-00047, declaration of Toro in support of remand motion.	0.20	765.00	153.00
04/22/20	JHG	Review ECF 12909, Order scheduling briefing on post-petition tort claims.	0.90	765.00	688.50
04/22/20	JHG	Review ECF 12911, motion regarding confidentiality agreement and UCC joinder.	0.40	765.00	306.00
04/22/20	JHG	Review ECF 769 in 17-03567.	0.40	765.00	306.00
04/22/20	JHG	Review daily email from S. Siff.	0.30	765.00	229.50
04/22/20	JHG	Review ECF 12918, motion to enforce order regarding relief from stay.	0.60	765.00	459.00
04/22/20	JHG	Review ECF 12921, Fiscal Agency status report.	0.70	765.00	535.50
04/22/20	JHG	Review email from S. Siff.	0.30	765.00	229.50
04/22/20	JHG	Review First Circuit opinion regarding appointment of trustee to pursue ERS claims.	1.20	765.00	918.00
04/22/20	JMS	Continued attention to issues related to Rule 3013 Motions and Court's disposition of same related to class discrimination in connection with [REDACTED]	1.70	500.00	850.00
04/22/20	JA	Attend Omnibus as to 30B issues and lift stay regarding UBS.	2.10	575.00	1,207.50
04/22/20	JA	Prepare Memorandum regarding litigation issues.	1.20	575.00	690.00
04/22/20	AMC	Review of "status report" of the Oversight Board in advance of the Court's April 22, 2020 omnibus hearing.	0.30	375.00	112.50
04/22/20	AMC	Review of extensive Omnibus Agenda [ECF No. 12899] in preparation for omnibus hearing of the Court on April 22, 2020.	0.40	375.00	150.00
04/22/20	AMC	Attend, telephonically, omnibus hearing before the Honorable Judge Swain with respect to the Committee's Rule 3013 motion (and related parties), and the UBS lift stay motion, and analyze presentations / rulings with respect to matters that may affect GJB's representation.	2.30	375.00	862.50

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04/22/20	AMC	Conference with John Arrastia concerning process forward regarding Rule 2004 discovery.	0.60	375.00	225.00
04/22/20	AMC	Review of recent fee applications and revise working memorandum concerning global confidential mediation negotiations.	1.20	375.00	450.00
04/22/20	JAD	Preparation of necessary revisions to the Memorandum Regarding [REDACTED]	1.40	315.00	441.00
04/22/20	JAD	Preparation of necessary and appropriate revisions to Memorandum [REDACTED]	1.80	315.00	567.00
04/23/20	JHG	Review daily summary prepared by S. Siff to identify and analyze strategic litigation issues.	0.40	765.00	306.00
04/23/20	JHG	Review ECF 12948, Order scheduling briefing on lift stay orders.	0.30	765.00	229.50
04/23/20	JHG	Review ECF 12947, minutes of proceeding.	0.50	765.00	382.50
04/23/20	JHG	Review order denying UBS Financial renewed stay relief motion.	0.30	765.00	229.50
04/23/20	JHG	Review email from J. Arrastia regarding budget litigation expense and conference regarding same.	0.40	765.00	306.00
04/23/20	JMS	Research related to appeal standards for denial of Rule 2004 examination.	1.70	500.00	850.00
04/23/20	JA	Review Memorandum regarding [REDACTED] (.7); research [REDACTED] (.6); review PSA provisions relating to [REDACTED] (.4); prepare and revise memorandum relating to [REDACTED] (2.6).	4.30	575.00	2,472.50
04/23/20	AMC	Research and analyze issues concerning cross-section between [REDACTED]	1.80	375.00	675.00
04/23/20	AMC	Conference with John Arrastia and Irina Sadovnic re: scheduling items and recent filings.	0.20	375.00	75.00
04/23/20	AMC	Review of 2020 PSA agreement to determine what, if anything, that document [REDACTED]	1.30	375.00	487.50
04/23/20	AMC	Analyze [REDACTED]	0.70	375.00	262.50
04/23/20	AMC	Compare / contrast / analyze Initial Plan and Disclosure Statement against New Plan and Disclosure Statement concerning claim treatment issues, and disputed claim amounts.	2.30	375.00	862.50
04/23/20	JZ	Receipt and review of Order Denying UCC's 3013 motion; attention to e-mails regarding same; update electronic case profile.	0.30	195.00	58.50

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04/23/20	JZ	Review of minute order relating to yesterday's hearings; update electronic case profile.	0.20	195.00	39.00
04/24/20	JHG	Review email and attachments regarding claim trading.	0.60	765.00	459.00
04/24/20	JA	Confer with Luc Despins regarding pending issues and confirmation related matters for conflict counsel (.4); confer with Scott Martinez regarding PSA analysis (.1); analyze interim summary of [REDACTED] (1.2); strategize regarding litigation options (.8)	2.50	575.00	1,437.50
04/24/20	AMC	Review of revised internal memorandum concerning [REDACTED]	0.30	375.00	112.50
04/27/20	JHG	Review email from Seth Cohen regarding motion to stay adversary.	0.30	765.00	229.50
04/27/20	JHG	Review information from Cate Lenz [REDACTED]	0.90	765.00	688.50
04/27/20	JHG	Prepare for and attend strategy conference call regarding PREPA.	1.10	765.00	841.50
04/27/20	JA	Attention to tolling agreements and expiration and updating agreements.	0.20	575.00	115.00
04/27/20	JAD	Preparation of additional section in memorandum regarding COFINA objections and appeal.	1.20	315.00	378.00
04/27/20	JNS	Attention to e-mails from John Arrastia and Jesus Suarez regarding the upcoming deadlines renewal of some Tolling Agreement. Update deadline records.	0.30	75.00	22.50
04/28/20	JHG	Review daily summary from S. Siff to identify and analyze strategic litigation issues.	0.30	765.00	229.50
04/28/20	JHG	Review ECF 12960, Assured urgent motion regarding briefing.	0.80	765.00	612.00
04/28/20	JMS	Ongoing review of issues concerning stayed litigation and plan process.	1.80	500.00	900.00
04/28/20	JAD	Analysis of additional documents regarding COFINA appeal and plan confirmation process to include same in memorandum regarding COFINA general objections and district court's findings to apply analysis to these matters.	1.30	315.00	409.50
04/28/20	JAD	Analysis of federal case law and authority regarding [REDACTED]	3.40	315.00	1,071.00
04/28/20	AMC	Meeting with Joyce Delgado and John Arrastia concerning [REDACTED]	0.40	375.00	150.00
04/29/20	JHG	Review and analysis of email from S. Siff to identify and analyze strategic litigation issues.	0.20	765.00	153.00
04/29/20	JHG	Review and analysis of ECF 12964, AMBAC opposition to FOMB 105 and 362 motion.	1.10	765.00	841.50

PROMESA - Official Committee of Unsecured Creditors
12272-001
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04/29/20	JHG	Review and analysis of issues raised in email from Alex Bongartz analyzing adversary complaint claims.	0.60	765.00	459.00
04/29/20	JHG	Review ECF 12988, supplemental declaration of Joff Mitchell of Zolfo Cooper.	0.80	765.00	612.00
04/29/20	JA	Review Motion to Extend Deadline and review Joint Status Report.	0.10	575.00	57.50
04/30/20	JNS	Attention to e-mails between our office and the attorneys at Brownrudnick regarding the renewal of the Tolling Agreement with PetroWest. Received, reviewed, calendar and update deadline records with new expiration date for the agreement.	0.20	75.00	15.00
Subtotal: B191 / General Litigation			358.00		\$185,049.00
B210 / Debtors' Fiscal Plan					
04/15/20	JMS	In connection with [REDACTED], continue research concerning [REDACTED] (2.3); prepare for an participate in strategy call with [REDACTED] (1.4); followup analysis of litigation issues (1.3)	5.00	500.00	2,500.00
04/16/20	JMS	In connection with potential [REDACTED]	2.60	500.00	1,300.00
Subtotal: B210 / Debtors' Fiscal Plan			7.60		\$3,800.00
B260 / Meetings of and Communications with Board					
04/09/20	JA	Prepare for participate in committee meeting.	0.80	575.00	460.00
04/15/20	JA	Committee call.	0.60	575.00	345.00
04/22/20	JA	Attend Committee call.	1.10	575.00	632.50
04/27/20	JA	Confer with Committee Chair regarding case status and issues relating to [REDACTED]	0.60	575.00	345.00
Subtotal: B260 / Meetings of and Communications with Board			3.10		\$1,782.50
B320 / Plan and Disclosure Statement					
04/02/20	MAF	Conference call regarding legal research [REDACTED] (.5)	0.50	550.00	275.00
04/03/20	EJ	E-mails with John Genovese and others regarding [REDACTED]	0.30	475.00	142.50
04/03/20	EJ	Review plan classes memorandum.	0.40	475.00	190.00

PROMESA - Official Committee of Unsecured Creditors
12272-001
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Page 30

04/07/20	MAF	Conference with J Arrastia to discuss [REDACTED] ahead of group call (.2)	0.20	550.00	110.00
04/08/20	MAF	Review email from J Arrastia outlining and discussing issues under [REDACTED] (.9); review outline of discussion topics in advance of group call (.4); attend conference call to strategize numerous issues related to the foregoing (2.0)	3.30	550.00	1,815.00
04/09/20	JA	Analyze Disclosure Statement regarding adversary claims handled by firm and litigation strategy.	1.20	575.00	690.00
04/09/20	EJ	Continued legal and general research [REDACTED]	2.60	475.00	1,235.00
04/10/20	EJ	Telephone call with Joyce Delagado regarding scope of [REDACTED] (.2). Continue legal research regarding [REDACTED] (.9).	1.10	475.00	522.50
04/14/20	JMS	In connection with potential [REDACTED] litigation, conduct extensive research [REDACTED] (2.6), research concerning [REDACTED] (1,6) and review first amended plan in connection with same (.9), prepare e-mail analysis for team (.8)	4.90	500.00	2,450.00
04/15/20	MAF	Review numerous emails among group [REDACTED] (0.6); attend conference calls with group to discuss the same, analyze issues, potential counter arguments, questions from client, and discuss next steps (1.1);	1.70	550.00	935.00
04/28/20	EJ	Review memorandum on [REDACTED]	2.30	475.00	1,092.50
04/30/20	EJ	Continued review and analysis of [REDACTED]	2.20	475.00	1,045.00
Subtotal: B320 / Plan and Disclosure Statement			20.70		\$10,502.50
Total			495.90		\$228,620.50

PROMESA - Official Committee of Unsecured Creditors
12272-001
Invoice No. 98308

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Timekeeper Summary

<u>ID</u>	<u>Timekeeper Name</u>	<u>Title</u>	<u>BillHours</u>	<u>BillRate</u>	<u>BillAmount</u>
JHG	John H Genovese	Sr. Partner	78.40	765.00	59,976.00
JMS	Jesus M Suarez	Partner	57.50	500.00	28,750.00
MAF	Michael A Friedman	Partner	5.70	550.00	3,135.00
MGG	Mariaelena Gayo-Guitian	Partner	3.80	575.00	2,185.00
JA	John Arrastia	Partner	109.10	575.00	62,732.50
JAD	Joyce A Delgado	Associate	33.20	315.00	10,458.00
JPB	JP Bado	Associate	1.10	375.00	412.50
AMC	Angelo M Castaldi	Associate	87.40	375.00	32,775.00
EJ	Eric Jacobs	Associate	17.80	475.00	8,455.00
JNS	Jessey N Sardina	Paralegal	0.70	75.00	52.50
CE	Carolyn Esser	Paralegal	1.00	150.00	150.00
CBH	Colleen B Hopkins	Paralegal	0.30	195.00	58.50
SS	Steve Siff	Paralegal	74.50	195.00	14,527.50
JZ	Johana Zamora	Paralegal	25.40	195.00	4,953.00
Total			495.90		\$228,620.50

Costs and incurrent and advanced

<u>Date</u>	<u>Description</u>	<u>Amount</u>
04/30/2020	Data management and hosting (12272-001) Trustpoint.One 20-04203	7,029.08
Total Costs incurrent and advanced		\$7,029.08
Current Fees and Costs		\$235,649.58

Genovese Joblove & Battista, P.A.

100 Southeast Second Street, 44th Floor
Miami, Florida 33131
Telephone (305) 349-2300 Facsimile (305) 349-2310
Employer ID# 65-0518134

PROMESA - Official Committee of Unsecured Creditors

July 7, 2020
Please Refer to
Invoice Number: 98309

Attn:

GJB Tax ID No. 65-0518134

Re: PROMESA: Official Committee of Unsecured Creditors / PREPA Adversary - Puerto Rico Electric Power Authority

SUMMARY / REMITTANCE COPY

Client/Matter # 12272-002

PROMESA - Official Committee of Unsecured Creditors

PROMESA: Official Committee of Unsecured Creditors / PREPA Adversary - Puerto Rico Electric Power Authority

(Services rendered outside of Puerto Rico)

For fees for professional services
for the period ending Apr 30, 2020

13,899.00

Costs incurred and advanced

Current Fees and Costs Due

13,899.00

We encourage our clients to pay via ACH, however, in the event that you pay by check, please send payment to the remittance address below:

TO PROTECT AGAINST FRAUD, the Firm will not change its wiring instructions via email. We strongly encourage clients to confirm any change in wiring instructions by contacting Ken Forrest @ 305-349-2312 or via email @ kforrest@gjb-law.com and requesting written and verbal confirmation.

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Routing Number : 066015767
Account Number : 21007711

Remittance Address:

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Miami, Florida 33131

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PROMESA - Official Committee of Unsecured Creditors

July 7, 2020
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Re: PROMESA: Official Committee of Unsecured Creditors / PREPA Adversary - Puerto Rico Electric Power Authority

FOR PROFESSIONAL SERVICES RENDERED
for the period ending Apr 30, 2020

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
B110 / Case Administration					
04/27/20	JZ	Attention to Tolling Agreement Deadlines and chart from J. Sardina regarding same.	0.40	195.00	78.00
Subtotal: B110 / Case Administration			0.40		\$78.00
B191 / General Litigation					
04/01/20	JZ	Receipt and review of FOMB's reply in support of the Government Parties' Motion to Adjourn the June 17, 2020 Hearing on the PREPA 9019 Motion; circulate same; update electronic case profile.	0.40	195.00	78.00
04/01/20	JZ	Receipt and review of Answer to complaint filed in ADV 19-359; circulate same; update electronic case profile.	0.50	195.00	97.50
04/02/20	JA	Review Order Granting Adjournment.	0.10	575.00	57.50
04/02/20	JZ	Receipt and review of Order Granting Receipt and review of Joint Urgent Motion which seeks the adjournment of the hearing on, and all remaining deadlines applicable to the PREPA 9019 motion; calendar deadlines; update electronic case profile.	0.30	195.00	58.50
04/03/20	JA	Review Joint Status Report AP 453.	0.30	575.00	172.50
04/06/20	JA	Review and execute Tolling Agreement.	0.20	575.00	115.00
04/07/20	JMS	Review issues concerning tolling agreements and extensions regarding same.	0.80	500.00	400.00

PROMESA - Official Committee of Unsecured Creditors
12272-002
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Page 2

04/07/20	JZ	Receipt and review of FOMB's Urgent Motion to Extend Certain Briefing Deadlines and the Hearing in Connection with PREPAs Urgent Motion for Entry of an Order Authorizing PREPA to Assume Certain Contracts with Ecoelctrica, L.P. and Gas Natural Aproveisionamientos SDG; circulate same; update electronic case profile.	0.30	195.00	58.50
04/08/20	JNS	Attention to e-mails regarding Amended tolling Agreement for Shell Trading US. Update electronic record with executed amended copy, and update tracking chart.	0.20	75.00	15.00
04/08/20	JZ	Receipt and review of Order Granting Urgent Motion to Extend Certain Briefing Deadlines re: Motion for Entry of an Order Authorizing PREPA to Assume Certain Contracts with Ecoelctrica, L.P. and Gas Natural Aproveisionamientos SDG [ECF No. 1960]; circulate same; calendar hearing date and deadlines; update electronic case profile.	0.30	195.00	58.50
04/10/20	AMC	Review, summarize, and analyze Committee classification motion re: classes 37 and 42 of the Plan, and Assured's partial joinder regarding the same (.8), and e-mail to J. Arrastia and J. Genovese concerning the same.	0.90	375.00	337.50
04/10/20	AMC	Review, summarize, and analyze recent docket activity and filings in removed adversary proceeding involving Vitol and PREPA.	0.30	375.00	112.50
04/27/20	JA	Review and analyze case materials regarding court order relating to stay and motion for intervention (1.3); strategize regarding stay and intervention (.8); confer and strategize with A. Castaldi, J. Genovese, and J. Suarez regarding go-forward litigation plan and strategy (.6); attention to tolling agreements and expiration (.4)	3.10	575.00	1,782.50
04/27/20	JMS	Attention to PetroWest tolling issues (.5) and Fuel Oil Status Report preparation and litigation posture (1.9)	2.40	500.00	1,200.00
04/27/20	AMC	Analyze and review tolling agreements applicable to certain putative defendants in actions brought by the FOMB and Committee, and issues pertaining to upcoming, Court-ordered joint status report.	0.70	375.00	262.50
04/27/20	AMC	Telephone conference with GJB team to discuss going-forward strategy regarding 19-ap-388.	0.80	375.00	300.00
04/27/20	AMC	Commenced research concerning impact of pending bankruptcy on complex, multi-defendant class action that existed pre-petition.	1.20	375.00	450.00
04/28/20	JMS	Attention to PetroWest tolling agreement (.7)	0.70	500.00	350.00
04/28/20	AMC	Researched for, and review of, Rule 2004 order granted by Court dealing with potential analogous factual situation.	0.20	375.00	75.00
04/28/20	AMC	Research concerning impact of pending bankruptcy on complex, multi-defendant class action that existed pre-petition.	1.30	375.00	487.50
04/29/20	JA	Strategize regarding litigation strategy and plan regarding Joint Status Report and beyond.	0.80	575.00	460.00

PROMESA - Official Committee of Unsecured Creditors
12272-002
Invoice No. 98309

Page 3

04/29/20	JMS	Attention to issues arising from upcoming status report in Fuel Oil litigation (1.5)	1.50	500.00	750.00
04/29/20	AMC	Research concerning and analysis of bankruptcy authorities [REDACTED]	2.10	375.00	787.50
04/29/20	AMC	Researched and analyzed the breadth of Section 105 [REDACTED]	2.20	375.00	825.00
04/30/20	JA	Strategize with A. Castaldi and J. Suarez regarding strategy regarding pending issues in action, intervention and stay (.6); review legal research regarding intervention (.3); attention to PetroWest tolling agreement, unsigned by tolled defendants and preparation to file complaint in absence (.4); review draft complaint against PetroWest (.4); execute tolling agreements (.1); confer with counsel regarding tolling (.1)	1.90	575.00	1,092.50
04/30/20	JMS	Review issues relating to PetroWest and tolling agreement (.8); review issues regarding proposed intervention (1.3); review issues concerning status report (1.1)	3.20	500.00	1,600.00
04/30/20	AMC	Review, analyze, and summarize current status of PREPA Title III case, RSA negotiations, PREPA fuel oil litigation (19-388), and filings concerning the same.	2.30	375.00	862.50
04/30/20	AMC	Began review of fraudulent transfer complaint circulated by co-counsel concerning tolled party.	0.60	375.00	225.00
04/30/20	AMC	Conference call with John Arrastia and Jesus Suarez concerning going-forward strategy in 19-ap-388.	0.40	375.00	150.00
04/30/20	AMC	Draft and prepare analysis / summary of parties various positions concerning stay and intervention in 19-388.	1.60	375.00	600.00
Subtotal: B191 / General Litigation			31.60		\$13,821.00
Total			32.00		\$13,899.00

Timekeeper Summary

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JMS	Jesus M Suarez	Partner	8.60	500.00	4,300.00
JA	John Arrastia	Partner	6.40	575.00	3,680.00
AMC	Angelo M Castaldi	Associate	14.60	375.00	5,475.00
JNS	Jessey N Sardina	Paralegal	0.20	75.00	15.00
JZ	Johana Zamora	Paralegal	2.20	195.00	429.00
Total			32.00		\$13,899.00

Current Fees and Costs

\$13,899.00

Genovese Joblove & Battista, P.A.

100 Southeast Second Street, 44th Floor
Miami, Florida 33131
Telephone (305) 349-2300 Facsimile (305) 349-2310
Employer ID# 65-0518134

PROMESA - Official Committee of Unsecured Creditors

July 7, 2020
Please Refer to
Invoice Number: 98310

Attn:

GJB Tax ID No. 65-0518134

Re: PROMESA: Official Committee of Unsecured Creditors / ERS Litigation - Employees Retirement System of the
~~Government - Commonwealth of Puerto Rico~~

SUMMARY / REMITTANCE COPY

Client/Matter # 12272-003

PROMESA - Official Committee of Unsecured Creditors

PROMESA: Official Committee of Unsecured Creditors / ERS Litigation - Employees Retirement System of the Government
Commonwealth of Puerto Rico

(Services rendered outside of Puerto Rico)

For fees for professional services
for the period ending Apr 30, 2020

6,363.50

Costs incurred and advanced

Current Fees and Costs Due

6,363.50

We encourage our clients to pay via ACH, however, in the event that you pay by check, please send payment to the remittance address below:

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July 7, 2020
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~~Government - Commonwealth of Puerto Rico~~

FOR PROFESSIONAL SERVICES RENDERED
for the period ending Apr 30, 2020

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
B191 / General Litigation					
04/01/20	JA	Review correspondence regarding document production.	0.10	575.00	57.50
04/05/20	JZ	Conference with J. Arrastia regarding Answer to Complaint filed in ADV. 19-00359.	0.30	195.00	58.50
04/06/20	JA	Review case status and strategy regarding AP 359 (.2); confer and strategize with Jesus Suarez (.2)	0.40	575.00	230.00
04/06/20	JMS	Work on analysis of plan issues that impact underwriter litigation.	3.40	500.00	1,700.00
04/08/20	JZ	Receipt and review of the Joint Status Report Regarding Discovery and Briefing Schedule With Respect to Certain Issues Raised in Certain Contested Matters and Adversary Proceedings advising the Court of the status of negotiations related to timing of discovery and briefing of certain issues and proposed litigation schedule filed in ADV. 19-355, 19-356, 19-357, 19-359, and 19-361; circulate same; update each electronic case profile.	0.70	195.00	136.50
04/13/20	JA	Review Order in AP 359 (.1); review Order in ECF 356, 357, 359 (.1)	0.20	575.00	115.00

PROMESA - Official Committee of Unsecured Creditors
12272-003
Invoice No. 98310

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04/13/20	IRS	Review internal correspondence regarding AP 19-359 and prepare correspondence to Counsel for SCC regarding bondholder motion for extension of time. (.3)	2.10	350.00	735.00
		Receipt and review order requiring joint proposed scheduling order entered in AP 19-359, 357, 355. (.2)			
		Review internal correspondence amongst government parties regarding proposed joint scheduling order. (.1)			
		Review and revise memorandum regarding extension of time to effectuate service of process. (.5)			
		Strategize regarding claims asserted in AP 19-355 and pending request for dismissal from Och Ziff. (.8)			
		Confer with SCC counsel regarding common interest clawback claims and drafting procedure. (.2)			
04/13/20	AMC	Internal e-mail concerning pending research issues.	0.10	375.00	37.50
04/13/20	JZ	Receipt and review of Motion requesting extension of time to answer complaint filed by Defendant 10H and 11H; receipt of Order setting deadline to file status report regarding position on same; circulate filings; calendar deadline; update electronic case profile.	0.60	195.00	117.00
04/13/20	JZ	Receipt and review of Order Regarding ERS Litigation Joint Status Report filed in ADV. 19-356, 19-357, 19-359, 19-361, and 19-367; calendar deadline to file proposed order incorporating litigation schedule; update each electronic case profile.	0.70	195.00	136.50
04/14/20	IRS	Attend to correspondence regarding joint proposed scheduling order in ERS APs.	0.30	350.00	105.00
04/14/20	JZ	Receipt and review of Order Regarding Procedures for April 22nd hearings; calendar the numerous deadlines contained therein; circulate same; update electronic case profile.	0.50	195.00	97.50
04/15/20	JZ	Receipt and review of Joint Motion filing proposed Order Regarding ERS Litigation Joint Status Report filed in ADV. 19-356, 19-357, 19-359, 19-361, and 19-367; circulate same; update each electronic case profile.	0.50	195.00	97.50
04/16/20	AMC	Analyze status of Adversary Proceedings 19-355 and 19-359.	0.20	375.00	75.00

PROMESA - Official Committee of Unsecured Creditors
12272-003
Invoice No. 98310

Page 3

04/17/20	JZ	Receipt and review of Order Regarding Discovery and Briefing Schedule With Respect to Certain Issues Raised in Certain Contested Matters and Adversary Proceedings Related to the Bonds Issued by ERS filed in ADV. 19-355, 19-356, 19-357, 19-358, 19-359, 19-361 and 19-367; calendar all deadlines contained in the Order; update each electronic case profile; review of each adversary docket to determine which Defendants have filed Notices of Appearance in the ERS adversary cases since said Defendants are exempt from stay per Order; update master excel sheet to include information in the ERS order and to highlight the Defendant's exempt from stay; draft e-mail with synopsis of order and the matters affected by same.	3.00	195.00	585.00
04/20/20	JA	Review Order regarding ERS deadlines.	0.30	575.00	172.50
04/20/20	JZ	Receipt and review of Joint Urgent Joint Motion to Modify the Schedule for Resolution of the ERS Bondholder Claims and Administrative Expense Motions [ECF No. 868]; circulate same; update electronic case profile.	0.40	195.00	78.00
04/21/20	JZ	Receipt and review of Motion to Withdraw Motion requesting extension of time to answer complaint filed by Defendant 10H and 11H; circulate same; update electronic case profile.	0.30	195.00	58.50
04/21/20	JZ	Receipt and review of Order Granting Joint Urgent Joint Motion to Modify the Schedule for Resolution of the ERS Bondholder Claims and Administrative Expense Motions [ECF No. 871]; circulate same; calendar all deadlines contained in order; update electronic case profile.	0.60	195.00	117.00
04/22/20	AMC	Review and analyze appellate decision concerning certain bondholders' rights to bring derivative claims under Section 926.	0.70	375.00	262.50
04/22/20	JZ	Receipt and review of Text Order on the Motion to Withdraw Motion requesting extension of time to answer complaint filed by Defendant 10H and 11H; circulate same; update electronic case profile.	0.20	195.00	39.00
04/23/20	AMC	Review, analyze, and summarize numerous joint motions of the Committee, SCC, certain ERS Bondholders, and the Fiscal agent concerning scheduling pertaining to: lien scope issues, ultra vires issues, Claim objections, and Administrative Claim objections and recently-entered orders entered thereon.	1.60	375.00	600.00
04/24/20	AMC	Review of FOMB / Committee ERS claim objections raising certain "gating" issues, and thereafter juxtapose said proceedings against treatment of ERS bondholders in the most recent amended plan.	1.70	375.00	637.50
04/30/20	JA	Attention to discovery disputes and production.	0.20	575.00	115.00
Subtotal: B191 / General Litigation			19.10		\$6,363.50
Total			19.10		\$6,363.50

PROMESA - Official Committee of Unsecured Creditors
12272-003
Invoice No. 98310

Page 4

Timekeeper Summary

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AMC	Angelo M Castaldi	Associate	4.30	375.00	1,612.50
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Total			19.10		\$6,363.50

Current Fees and Costs

\$6,363.50

Genovese Joblove & Battista, P.A.

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Miami, Florida 33131
Telephone (305) 349-2300 Facsimile (305) 349-2310
Employer ID# 65-0518134

PROMESA - Official Committee of Unsecured Creditors

July 7, 2020
Please Refer to
Invoice Number: 98311

Attn:

GJB Tax ID No. 65-0518134

Re: PROMESA: Official Committee of Unsecured Creditors / HTA Litigation - Puerto Rico Highways & Transportation Authority

SUMMARY / REMITTANCE COPY

Client/Matter # 12272-004

PROMESA - Official Committee of Unsecured Creditors

PROMESA: Official Committee of Unsecured Creditors / HTA Litigation - Puerto Rico Highways & Transportation Authority

(Services rendered outside of Puerto Rico)

For fees for professional services
for the period ending Apr 30, 2020

175.50

Costs incurred and advanced

Current Fees and Costs Due

175.50

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Telephone (305) 349-2300 Facsimile (305) 349-2310
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PROMESA - Official Committee of Unsecured Creditors

July 7, 2020
Please Refer to
Invoice Number: 98311

Attn:

GJB Tax ID No. 65-0518134

Re: PROMESA: Official Committee of Unsecured Creditors / HTA Litigation - Puerto Rico Highways & Transportation
Authority

FOR PROFESSIONAL SERVICES RENDERED
for the period ending Apr 30, 2020

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
B191 / General Litigation					
04/08/20	JZ	Receipt and review of Joint Stipulation to Modify Certain Deadlines in Connection with Lift Stay and Related Motions and Revenue Bond Complaints [ECF No. 760] in the HTA case; receipt of order approving same; calendar hearing date; e-mails to and from A. Castaldi regarding our role in this matter.	0.50	195.00	97.50
04/21/20	JZ	Receipt and review of the Stipulation and Protective Order relating to the Lift Stay Motion (ECF No. 769); circulate same; update electronic case profile.	0.40	195.00	78.00
Subtotal: B191 / General Litigation			0.90		\$175.50
Total			0.90		\$175.50

Timekeeper Summary

<u>ID</u>	<u>Timekeeper Name</u>	<u>Title</u>	<u>BillHours</u>	<u>BillRate</u>	<u>BillAmount</u>
JZ	Johana Zamora	Paralegal	0.90	195.00	175.50
Total			0.90		\$175.50

Current Fees and Costs

\$175.50

Genovese Joblove & Battista, P.A.

100 Southeast Second Street, 44th Floor
Miami, Florida 33131
Telephone (305) 349-2300 Facsimile (305) 349-2310
Employer ID# 65-0518134

PROMESA - Official Committee of Unsecured Creditors

July 7, 2020
Please Refer to
Invoice Number: 98313

Attn:

GJB Tax ID No. 65-0518134

Re: PROMESA: Official Committee of Unsecured Creditors / Special Conflict Counsel

SUMMARY / REMITTANCE COPY

Client/Matter # 12272-001
PROMESA - Official Committee of Unsecured Creditors
PROMESA: Official Committee of Unsecured Creditors / Special Conflict Counsel

(Services rendered outside of Puerto Rico)

For fees for professional services for the period ending May 31, 2020	75,162.50
Costs incurred and advanced	<u>7,029.08</u>
Current Fees and Costs Due	82,191.58

We encourage our clients to pay via ACH, however, in the event that you pay by check, please send payment to the remittance address below:

TO PROTECT AGAINST FRAUD, the Firm will not change its wiring instructions via email. We strongly encourage clients to confirm any change in wiring instructions by contacting Ken Forrest @ 305-349-2312 or via email @ kforrest@gjb-law.com and requesting written and verbal confirmation.

Wiring and ACH Instructions:

Bank Name: Biscayne Bank
Bank Telephone: 305-447-5050
Account Name: Genovese Joblove & Battista, P.A. - Operating
Routing Number : 066015767
Account Number : 21007711

Remittance Address:

Genovese Joblove & Battista, P.A.
100 Southeast Second Street, 44th Floor
Miami, Florida 33131

For payment, please reference the invoice, client and matter number(s) being paid.
Please refer all questions to Ken Forrest @ 305-349-2312 or via email @ kforrest@gjb-law.com

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for the period ending May 31, 2020

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
B110 / Case Administration					
05/01/20	JZ	Review of internal pleading report circulated by S. Siff.	0.30	195.00	58.50
05/04/20	JZ	Receipt and review of Order granting the FOMB's request to file an updated status report, including a proposal for the Debtors' plan and disclosure statement process [ECF No. 13023]; calendar deadline; circulate same; update electronic case profile.	0.30	195.00	58.50
05/04/20	JZ	Review of internal pleading report circulated by S. Siff.	0.30	195.00	58.50
05/05/20	MGG	Review matters scheduled for hearing on May 13, 2020 at 9:30 a.m.	0.20	575.00	115.00
05/05/20	JZ	Review of internal pleading report circulated by S. Siff.	0.40	195.00	78.00
05/06/20	IRS	Review docketing analysis and extensive order summaries prepared by S. Siff regarding lift stay motions and briefing schedules.	0.60	350.00	210.00
05/06/20	JZ	Review of internal pleading report circulated by S. Siff.	0.30	195.00	58.50
05/07/20	JZ	Review of internal pleading report circulated by S. Siff.	0.40	195.00	78.00
05/08/20	JZ	Review of internal pleading report circulated by S. Siff.	0.20	195.00	39.00
05/11/20	IRS	Receipt and review docket entry updates and recent order summaries prepared by S. Siff.	0.20	350.00	70.00
05/11/20	JZ	Receipt and review of internal memo prepared by S. Siff.	0.20	195.00	39.00

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05/12/20	JZ	Receipt and review of internal memo prepared by S. Siff.	0.20	195.00	39.00
05/13/20	JZ	Receipt and review of internal memo prepared by S. Siff.	0.50	195.00	97.50
05/14/20	JZ	Receipt and review of internal memo prepared by S. Siff.	0.40	195.00	78.00
05/14/20	JZ	Numerous e-mails to and from J. Nunez and J Arrastia regarding status meeting.	0.20	195.00	39.00
05/15/20	JZ	Receipt and review of internal memo prepared by S. Siff.	0.20	195.00	39.00
05/18/20	JZ	Receipt and review of internal memo prepared by S. Siff.	0.30	195.00	58.50
05/19/20	CBH	E-mail correspondence and send copies of proof of claims to M. Guitian.	0.30	195.00	58.50
05/19/20	JZ	Conference with A. Gonzalez regarding deadlines.	0.30	195.00	58.50
05/19/20	JZ	Receipt and review of internal memo prepared by S. Siff.	0.30	195.00	58.50
05/20/20	IRS	Receipt and review docket entry updates and recent order summaries prepared by S. Siff.	0.50	350.00	175.00
05/20/20	JZ	Review of internal memo circulated by S. Siff	0.50	195.00	97.50
05/21/20	IRS	Receipt and review of recent order summaries and docket entry updates prepares by S. Siff.	0.30	350.00	105.00
05/21/20	JZ	Review of internal e-mails circulated by Si.Siff	0.40	195.00	78.00
05/22/20	JZ	Review of internal e-mail circulated by S. Siff	0.30	195.00	58.50
05/26/20	JZ	Review of internal memo circulated by S. Siff.	0.20	195.00	39.00
05/26/20	JZ	Receipt and review of Notice Regarding Proposed Amendment to Eleventh Amended Notice and Case Management Procedures [ECF No. 13219]; circulate same; update electronic case profile.	0.30	195.00	58.50
05/26/20	JZ	Receipt of Order Regarding Procedures for June 3-4 Omnibus Hearings [ECF No. 13320]; calendar deadlines in order; circulate same; update electronic case profile.	0.40	195.00	78.00
05/27/20	JZ	Review of internal memo circulated by S. Siff.	0.30	195.00	58.50
05/28/20	JZ	Review of internal memo circulated by S. Siff.	0.40	195.00	78.00

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05/29/20	JZ	Review of internal memo circulated by S. Siff.	0.40	195.00	78.00
Subtotal: B110 / Case Administration			10.10		\$2,293.50
B113 / Pleadings Review					
05/01/20	SS	Review and Analyze all court filings in the Main Case, Title III cases and Adversary Proceedings from late on April 30 in order to prepare digest of matters relevant to special litigation counsel and distribute to appropriate team members.	1.40	195.00	273.00
05/01/20	SS	Prepare digest of matters and filings from late on April 30 relevant to special litigation counsel and distribute to appropriate team members.	0.90	195.00	175.50
05/01/20	SS	Review and Analyze all court filings in the Main Case, Title III cases and Adversary Proceedings on May 1 in order to prepare digest of matters relevant to special litigation counsel and distribute to appropriate team members.	1.80	195.00	351.00
05/01/20	SS	Prepare digest of matters and filings on May 1 relevant to special litigation counsel and distribute to appropriate team members.	0.80	195.00	156.00
05/02/20	SS	Review and Analyze all court filings in the Main Case, Title III cases and Adversary Proceedings from late on May 1 in order to prepare digest of matters relevant to special litigation counsel and distribute to appropriate team members.	1.20	195.00	234.00
05/04/20	SS	Review and Analyze all court filings from late May 1 through May 3 in the Main Case, Title III cases and Adversary Proceedings in order to prepare digest of matters relevant to special litigation counsel and distribute to appropriate team members.	1.00	195.00	195.00
05/04/20	SS	Prepare digest of matters and filings from late May 1 through May 3 relevant to special litigation counsel and distribute to appropriate team members.	1.40	195.00	273.00
05/04/20	SS	Review and Analyze all court filings on May 4 in the Main Case, Title III cases and Adversary Proceedings in order to prepare digest of matters relevant to special litigation counsel and distribute to appropriate team members.	1.40	195.00	273.00
05/04/20	SS	Prepare digest of matters and filings on May 4 relevant to special litigation counsel and distribute to appropriate team members.	1.50	195.00	292.50
05/05/20	SS	Review and Analyze all court filings from late on May 4 in the Main Case, Title III cases and Adversary Proceedings in order to prepare digest of matters relevant to special litigation counsel and distribute to appropriate team members.	1.60	195.00	312.00
05/05/20	SS	Prepare digest of matters and filings from late on May 4 relevant to special litigation counsel and distribute to appropriate team members.	1.60	195.00	312.00

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05/05/20	SS	Review and Analyze all court filings on May 5 in the Main Case, Title III cases and Adversary Proceedings in order to prepare digest of matters relevant to special litigation counsel and distribute to appropriate team members.	2.10	195.00	409.50
05/05/20	SS	Prepare digest of matters and fdilings on May 5 relevant to special litigation counsel and distribute to appropriate team members.	1.40	195.00	273.00
05/06/20	SS	Review and Analyze all court filings from late on May 5 in the Main Case, Title III cases and Adversary Proceedings in order to prepare digest of matters relevant to special litigation counsel and distribute to appropriate team members.	1.80	195.00	351.00
05/06/20	SS	Prepare digest of matters and filimgs from late on May 5 relevant to special litigation counsel and distribute to appropriate team members.	1.30	195.00	253.50
05/06/20	SS	Review and Analyze all court filings on May 6 in the Main Case, Title III cases and Adversary Proceedings in order to prepare digest of matters relevant to special litigation counsel and distribute to appropriate team members.	1.60	195.00	312.00
05/06/20	SS	Prepare digest of matters and filings on May 6 relevant to special litigation counsel and distribute to appropriate team members.	1.40	195.00	273.00
05/07/20	SS	Review and Analyze all court filings from late on May 6 in the Main Case, Title III cases and Adversary Proceedings in order to prepare digest of matters relevant to special litigation counsel and distribute to appropriate team members.	2.10	195.00	409.50
05/07/20	SS	Prepare digest of matters and filings from late on May 6 relevant to special litigation counsel and distribute to appropriate team members.	1.30	195.00	253.50
05/07/20	SS	Review and Analyze all court filings on May 7 in the Main Case, Title III cases and Adversary Proceedings in order to prepare digest of matters relevant to special litigation counsel and distribute to appropriate team members.	1.90	195.00	370.50
05/07/20	SS	Prepare digest of matters and filings on May 7 relevant to special litigation counsel and distribute to appropriate team members.	1.20	195.00	234.00
05/08/20	SS	Review and Analyze all court filings from late on May 7 in the Main Case, Title III cases and Adversary Proceedings in order toprepare digest of matters relevant to special litigation counsel and distribute to appropriate team members.	1.80	195.00	351.00
05/08/20	SS	Prepare digest of matters and filings from late on May 7 relevant to special litigation counsel and distribute to appropriate team members.	1.40	195.00	273.00
05/08/20	SS	Review and Analyze all court filings on May 8, including late filings in the Main Case, Title III cases and Adversary Proceedings in order to prepare digest of matters relevant to special litigation counsel and distribute to appropriate team members.	1.80	195.00	351.00

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05/08/20	SS	Prepare digests of matters and filings on May 8, including late filings, relevant to special litigation counsel and distribute to appropriate team members.	1.40	195.00	273.00
05/11/20	SS	Review and Analyze all court filings on May 11 in the Main Case, Title III cases and Adversary Proceedings in order to prepare digest of matters relevant to special litigation counsel and distribute to appropriate team members.	1.60	195.00	312.00
05/11/20	SS	Prepare digest of matters and filings on May 11 relevant to special litigation counsel and distribute to appropriate team members.	1.40	195.00	273.00
05/11/20	SS	Review and Analyze all court filings from May 9 an 10 in the Main Case, Title III cases and Adversary Proceedings and prepare digest of matters relevant to special litigation counsel and distribute to appropriate team members.	0.80	195.00	156.00
05/11/20	SS	Prepare digest of matters and filings from late on May 8 through May 10 relevant to special litigation counsel and distribute to appropriate team members.	1.30	195.00	253.50
05/12/20	SS	Review and Analyze all court filings from late on May 11 in the Main Case, Title III cases and Adversary Proceedings in order to prepare digest of matters relevant to special litigation counsel and distribute to appropriate team members.	2.40	195.00	468.00
05/12/20	SS	Prepare digest of matters and filings from late on May 11 relevant to special litigation counsel and distribute to appropriate team members.	1.00	195.00	195.00
05/12/20	SS	Review and Analyze all court filings on May 12 in the Main Case, Title III cases and Adversary Proceedings in order to prepare digest of matters relevant to special litigation counsel and distribute to appropriate team members.	1.80	195.00	351.00
05/12/20	SS	Prepare digest of matters and filings on May 12 relevant to special litigation counsel and distribute to appropriate team members.	1.20	195.00	234.00
05/13/20	SS	Review and analyze all court filings from late on May 12 in the Main Case, Title III cases and Adversary Proceedings in order to prepare digest of matters relevant to special litigation counsel and distribute to appropriate team members.	1.60	195.00	312.00
05/13/20	SS	Prepare digest of matters and filings from late on May 12 relevant to special litigation counsel and distribute to appropriate team members.	1.10	195.00	214.50
05/13/20	SS	Review and Analyze all court filings on May 13 in the Main Case, Title III cases and Adversary Proceedings in order to prepare digest of matters relevant to special litigation counsel and distribute to appropriate team members.	1.80	195.00	351.00
05/13/20	SS	Prepare digest of matters and filings on May 13 relevant to special litigation counsel and distribute to appropriate team members.	1.10	195.00	214.50

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05/14/20	SS	Review and Analyze all court filings from late on May 13 in the Main Case, Title III cases and Adversary Proceedings in order to prepare digest of matters relevant to special litigation counsel and distribute to appropriate team members.	2.10	195.00	409.50
05/14/20	SS	Prepare digest of matters and filings on May 14 relevant to special litigation counsel and distribute to appropriate team members.	1.10	195.00	214.50
05/14/20	SS	Review and Analyze all court filings on May 14 in the Main Case, Title III cases and Adversary Proceedings in order to prepare digest of matters relevant to special litigation counsel and distribute to appropriate team members.	1.80	195.00	351.00
05/14/20	SS	Prepare digest of matters and filings on May 14 relevant to special litigation counsel and distribute to appropriate team members.	1.20	195.00	234.00
05/15/20	SS	Review and Analyze all court filings from late on May 14 in the Main Case, Title III cases and Adversary Proceedings in order to prepare digest of matters relevant to special litigation counsel and distribute to appropriate team members.	1.70	195.00	331.50
05/15/20	SS	Prepare digest of matters and filings from late on May 14 relevant to special litigation counsel and distribute to appropriate team members.	1.30	195.00	253.50
05/15/20	SS	Review and Analyze all court filings on May 15 in the Main Case, Title III cases and Adversary Proceedings in order to prepare digest of matters relevant to special litigation counsel and distribute to appropriate team members.	1.60	195.00	312.00
05/15/20	SS	Prepare digest of matters and filings on May 15 relevant to special litigation counsel and distribute to appropriate team members.	1.40	195.00	273.00
05/18/20	SS	Review and Analyze all court filings from late on May 15 through May 19 in the Main Case, Title III cases and Adversary Proceedings in order to prepare digest of matters relevant to special litigation counsel and distribute to appropriate team members.	1.90	195.00	370.50
05/18/20	SS	Prepare digest of matters and filings from late May 15 through May 19 relevant to special litigation counsel and distribute to appropriate team members.	1.40	195.00	273.00
05/18/20	SS	Review and Analyze all court filings on May 18 in the Main Case, Title III cases and Adversary Proceedings in order to prepare digest of matters relevant to special litigation counsel and distribute to appropriate team members.	2.10	195.00	409.50
05/18/20	SS	Prepare digest of matters and filings on May 18 relevant to special litigation counsel and distribute to appropriate team members.	1.50	195.00	292.50

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05/19/20	SS	Review and Analyze all court filings from late on May 18 in the Main Case, Title III cases and Adversary Proceedings in order to prepare digest of matters relevant to special litigation counsel and distribute to appropriate team members.	1.80	195.00	351.00
05/19/20	SS	Prepare digest of matters relevant to special litigation counsel and distribute to appropriate team members.	1.30	195.00	253.50
05/19/20	SS	Review and Analyze all court filings on May 19 in the Main Case, Title III cases and Adversary Proceedings in order to prepare digest of matters relevant to special litigation counsel and distribute to appropriate team members.	2.10	195.00	409.50
05/19/20	SS	Prepare digest of matters and filings on May 19 relevant to special litigation counsel and distribute to appropriate team members.	1.30	195.00	253.50
05/20/20	SS	Review and Analyze all court filings from late on May 19 in the Main Case, Title III cases and Adversary Proceedings in order to prepare digest of matters relevant to special litigation counsel and distribute to appropriate team members.	1.80	195.00	351.00
05/20/20	SS	Prepare digest of matters and filings from late on May 19 relevant to special litigation counsel and distribute to appropriate team members.	1.30	195.00	253.50
05/20/20	SS	Review and Analyze all court filings on May 20 in the Main Case, Title III cases and Adversary Proceedings in order to prepare digest of matters relevant to special litigation counsel and distribute to appropriate team members.	1.60	195.00	312.00
05/20/20	SS	Prepare digest of matters and filings on May 20 relevant to special litigation counsel and distribute to appropriate team members.	1.20	195.00	234.00
05/21/20	SS	Review and Analyze all court filings from late on May 20 in the Main Case, Title III cases and Adversary Proceedings in order to prepare digest of matters relevant to special litigation counsel and distribute to appropriate team members.	1.80	195.00	351.00
05/21/20	SS	Review and Analyze all court filings from late on May 20 in the Main Case, Title III cases and Adversary Proceedings and prepare digest of matters relevant to special litigation counsel and distribute to appropriate team members.	1.50	195.00	292.50
05/21/20	SS	Review and Analyze all court filings on May 21 in the Main Case, Title III cases and Adversary Proceedings and prepare digest of matters relevant to special litigation counsel and distribute to appropriate team members.	2.20	195.00	429.00
05/21/20	SS	Prepare digest of matters and filings on May 21 relevant to special litigation counsel and distribute to appropriate team members.	1.30	195.00	253.50

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05/22/20	SS	Review and Analyze all court filings from late on May 21 in the Main Case, Title III cases and Adversary Proceedings in order to prepare digest of matters relevant to special litigation counsel and distribute to appropriate team members.	1.80	195.00	351.00
05/22/20	SS	Prepare digest of matters and filings from late on May 21 relevant to special litigation counsel and distribute to appropriate team members.	1.30	195.00	253.50
05/22/20	SS	Review and Analyze all court filings on May 22 in the Main Case, Title III cases and Adversary Proceedings in order to prepare digest of matters relevant to special litigation counsel and distribute to appropriate team members.	1.90	195.00	370.50
05/22/20	SS	Prepare digest of matters and filings on May 22 relevant to special litigation counsel and distribute to appropriate team members.	1.20	195.00	234.00
05/26/20	SS	Review and Analyze all court filings from late on May 22 through May 25 in the Main Case, Title III cases and Adversary Proceedings in order to prepare digest of matters relevant to special litigation counsel and distribute to appropriate team members.	2.10	195.00	409.50
05/26/20	SS	Prepare digest of matters and filings from late on May 22 through May 25 relevant to special litigation counsel and distribute to appropriate team members.	1.00	195.00	195.00
05/26/20	SS	Review and Analyze all court filings on May 26 in the Main Case, Title III cases and Adversary Proceedings in order to prepare digest of matters relevant to special litigation counsel and distribute to appropriate team members.	2.50	195.00	487.50
05/26/20	SS	Prepare digest of matters and filings on May 26 relevant to special litigation counsel and distribute to appropriate team members.	1.30	195.00	253.50
05/27/20	SS	Review and Analyze all court filings from late on May 26 in the Main Case, Title III cases and Adversary Proceedings in order to prepare digest of matters relevant to special litigation counsel and distribute to appropriate team members.	1.60	195.00	312.00
05/27/20	SS	Prepare digest of matters and filings from late on May 26 relevant to special litigation counsel and distribute to appropriate team members.	1.00	195.00	195.00
05/27/20	SS	Review and Analyze all court filings on May 27 in the Main Case, Title III cases and Adversary Proceedings in order to prepare digest of matters relevant to special litigation counsel and distribute to appropriate team members.	2.20	195.00	429.00
05/27/20	SS	Prepare digest of matters and filings on May 27 relevant to special litigation counsel and distribute to appropriate team members.	1.50	195.00	292.50

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05/28/20	SS	Review and Analyze all court filings from late on May 27 in the Main Case, Title III cases and Adversary Proceedings in order to prepare digest of matters relevant to special litigation counsel and distribute to appropriate team members.	2.20	195.00	429.00
05/28/20	SS	Prepare digest of matters and filings from late on May 27 relevant to special litigation counsel and distribute to appropriate team members.	1.30	195.00	253.50
05/28/20	SS	Review and Analyze all court filings on May 28 in the Main Case, Title III cases and Adversary Proceedings in order to prepare digest of matters relevant to special litigation counsel and distribute to appropriate team members.	2.20	195.00	429.00
05/28/20	SS	Prepare digest of matters and filings on May 28 relevant to special litigation counsel and distribute to appropriate team members.	1.40	195.00	273.00
05/29/20	SS	Review and Analyze all court filings from late on May 28 in the Main Case, Title III cases and Adversary Proceedings in order to prepare digest of matters relevant to special litigation counsel and distribute to appropriate team members.	1.70	195.00	331.50
05/29/20	SS	Prepare digest of matters and filings from late on May 28 relevant to special litigation counsel and distribute to appropriate team members.	0.90	195.00	175.50
05/29/20	SS	Review and Analyze all court filings on May 29, including a portion of late filings in the Main Case, Title III cases and Adversary Proceedings in order to prepare digest of matters relevant to special litigation counsel and distribute to appropriate team members.	2.60	195.00	507.00
05/29/20	SS	Prepare digest of matters and filings on May 29 relevant to special litigation counsel and distribute to appropriate team members.	1.70	195.00	331.50
Subtotal: B113 / Pleadings Review			125.90		\$24,550.50
B160 / Fee/Employment Applications					
05/01/20	MGG	Email to and from Valerie B. Soler re: January invoice and tax withholding.	0.20	575.00	115.00
05/08/20	MGG	Prepare and serve February Prebills on Committee for review and approval.	0.30	575.00	172.50
05/08/20	CE	Review February invoices and prepare draft e-mail for review and approval by the committee; E-mail correspondence with M. Guitian re: same.	0.60	150.00	90.00
05/22/20	MGG	Follow up call and email to Valerie Soler re: January Fee Statement and withholding.	0.20	575.00	115.00
05/26/20	MGG	Follow up and review and revise February Fee Cover Letter and attachments.	0.30	575.00	172.50
05/26/20	CE	Prepare Monthly Fee Statement for February; E-mail correspondence with M. Guitian re: same.	0.70	150.00	105.00

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05/27/20	MGG	Emails to and from Valerie Blay Soler re: imposition of tax on law firms.	0.30	575.00	172.50
05/27/20	MGG	Review ECF No. 13254 Fee Examiner's Supplementall Report on Uncontested Professional Fee Applications and treatment of GJB's Fees.	0.20	575.00	115.00
05/27/20	JZ	Receipt and review of Supplemental Report of the Fee Examiner On Uncontested Professional Fee Applications Recommended For Court Approval At Or Before The Omnibus Hearing Scheduled For June 3, 2020 [ECF No. 13254]; circulate same; update electronic case profile.	0.40	195.00	78.00
05/29/20	CE	Prepare Declaration to the Monthly Fee Statement for February; Forward to K. Forrest for review and execution.	0.60	150.00	90.00
05/29/20	JZ	Receipt and review of Informative Motion of the Fee Examiner pursuant to Order Regarding Procedures for June 3-4, 2020 Omnibus Hearing [ECF No. 13277]; circulate same; update electronic case profile.	0.40	195.00	78.00
Subtotal: B160 / Fee/Employment Applications			4.20		\$1,303.50
B161 / Budgeting					
05/06/20	JA	Prepare and revise fee statements.	0.40	575.00	230.00
05/11/20	JA	Prepare, revise and finalize June budget.	1.30	575.00	747.50
05/13/20	JA	Prepare statements in conformitiy with Fee Examiner requirements.	1.60	575.00	920.00
05/15/20	JA	Review correspondence from Fee Examiner.	0.60	575.00	345.00
05/18/20	JA	Revise March fee statements in conformity with fee examiner guidelines.	3.20	575.00	1,840.00
05/19/20	JA	Further analysis of inquiries by fee examiner as to interim fee statement.	0.40	575.00	230.00
05/31/20	MGG	Email to and from J. Arrastia re: monthly bills and Budget.	0.30	575.00	172.50
Subtotal: B161 / Budgeting			7.80		\$4,485.00
B190 / Other Contested Matters					
05/26/20	MGG	Review ECF #13217 Memorandum Opinion Regarding Committee's Rule 2019 Motion.	0.30	575.00	172.50
Subtotal: B190 / Other Contested Matters			0.30		\$172.50
B191 / General Litigation					

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05/01/20	JA	Research case status regarding [REDACTED] [REDACTED] (.4); review FOMB proposed disclosure statement schedule (.7)	1.10	575.00	632.50
05/01/20	SS	Reviewed docket to determine status of June 17 hearing regarding PREPA 9019 Motion as requested by J. Arrastia.	0.80	195.00	156.00
05/01/20	JZ	Receipt and review of the FOMB's Status Report Regarding the Covid -19 Pandemic and proposed Disclosure Statement; circulate same; update electronic case profile.	0.40	195.00	78.00
05/04/20	JHG	Review and analyze email from A. Castaldi regarding statutes of restructurings and status report regarding plan and disclosure statement.	1.80	765.00	1,377.00
05/04/20	JA	Review and analyze FOMB status report (.4); review order granting status report (.1)	0.50	575.00	287.50
05/04/20	ALG	Review financial related documents provided by Kobre Kim Report related to financial target claims and further identified as ALG Batch 8 (Docs 2097 - 2156(4.1).	1.90	565.00	1,073.50
05/04/20	JAD	Preparation of necessary edits to [REDACTED] [REDACTED]	0.70	315.00	220.50
05/04/20	IRS	Review recent docket entry updates and order summaries prepared by S. Siff.	0.30	350.00	105.00
05/04/20	AMC	Review, analyze, and summarize for circulation various recent filings concerning status of: plan and disclosure statement process, governmental budgetary process, 2021 FY fiscal budget approvals, and COVID measures.	1.20	375.00	450.00
05/05/20	JHG	Review daily summary (May 4, 2020) from S. Siff to identify and analyze strategic litigation issues.	0.70	765.00	535.50
05/05/20	JHG	Review order regarding setting schedule status report.	0.10	765.00	76.50
05/05/20	JHG	Review and analysis of ECF 1978, motion for protective order regarding assumption of amended Fuel Supply agreement.	0.90	765.00	688.50
05/05/20	JHG	Review ECF 1979, PREPA urgent motion regarding scheduling of deadlines and briefing.	0.30	765.00	229.50
05/05/20	JHG	Review email from A. Castaldi regarding [REDACTED]	0.30	765.00	229.50
05/05/20	JA	Review Order regarding HTA Lift Stay Motions.	0.10	575.00	57.50
05/05/20	JAD	Analysis of authorities regarding [REDACTED] [REDACTED]	4.10	315.00	1,291.50
05/05/20	AMC	Analyze predicates for bankruptcy court finding that disclosure statement satisfies Section 1125.	1.20	375.00	450.00

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05/06/20	JHG	Review email from Alex Bongartz regarding committee agenda and consideration of issues regarding pending litigation.	0.90	765.00	688.50
05/06/20	JHG	Review email summary from S. Siff to identify and analyze strategic litigation issues.	0.30	765.00	229.50
05/06/20	JHG	Review ECF 03283, Assured motion regarding briefing.	0.60	765.00	459.00
05/06/20	JAD	Continued analysis of authorities [REDACTED] [REDACTED]	2.70	315.00	850.50
05/06/20	JNS	Attention to emails from Steve Stiff circulating recent filed documents in the case and deadlines.	0.40	75.00	30.00
05/07/20	JHG	Review daily summary from S. Siff to identify and analyze strategic litigation issues.	0.30	765.00	229.50
05/07/20	JHG	Review ECF 13043, Court Order.	0.20	765.00	153.00
05/07/20	JA	[REDACTED]	0.60	575.00	345.00
05/07/20	MGG	Review ECF 13060: Retiree Committee, FOMB, Committee's Rule 37 Motion re: ultra vires dispute (.20). Review ECF 13066 re: briefing schedule (.10).	0.30	575.00	172.50
05/07/20	JAD	Analysis of federal case law and authority regarding practical [REDACTED] [REDACTED]	2.40	315.00	756.00
05/08/20	JHG	Review daily email from S. Siff to identify and analyze strategic litigation issues.	0.40	765.00	306.00
05/08/20	JA	Review research regarding Fiscal Plan.	0.40	575.00	230.00
05/08/20	JAD	Analysis of case dockets for sample Rule 2004 examination requests.	2.10	315.00	661.50
05/11/20	JHG	Review proposed budget for June.	0.80	765.00	612.00
05/11/20	JAD	Final edits to [REDACTED] [REDACTED]	1.80	315.00	567.00
05/12/20	JHG	Review daily summary from S. Siff to identify and analyze strategic litigation issues.	0.20	765.00	153.00
05/12/20	JHG	Review ECF 10380, briefing order and review schedule.	0.20	765.00	153.00
05/12/20	JHG	Review and analyze email from Alex Bongartz.	0.80	765.00	612.00
05/12/20	JHG	Review ECF 12918 and analysis of stay relief issues regarding shortfall and suggested support by Committee.	0.70	765.00	535.50

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05/12/20	JHG	Review research related to Law 29 ruling.	0.30	765.00	229.50
05/12/20	JHG	Review daily summary from S. Siff to analyze and identify strategic litigation issues.	0.40	765.00	306.00
05/12/20	JHG	Review ECF 1986 in PREPA, further support for protective report.	0.70	765.00	535.50
05/12/20	JMS	Continued review and analysis of issues relating to [REDACTED]	0.50	500.00	250.00
05/12/20	AMC	Review of internal memoranda analyzing / summarizing recent filings from May 7 through May 11.	0.40	375.00	150.00
05/12/20	AMC	Review of Committee motion to compel deposition testimony of various ERS bondholders, and review status of extant ERS bond litigation re: GJB matters.	0.40	375.00	150.00
05/12/20	AMC	Review of filings entered through May 12, including ECF 13092, ECF 13093, ECF 13094, ECF 13096.	0.30	375.00	112.50
05/12/20	JAD	Finalized Memorandum on Equitable Subordination.	0.80	315.00	252.00
05/13/20	JHG	Review daily summary prepared by S. Siff to identify and analyze strategic litigation issues.	0.30	765.00	229.50
05/13/20	JHG	Review ECF 13090, opposition to ECF 13089 AAFAF's motion for extension filed by Consul-Tech.	0.40	765.00	306.00
05/13/20	JHG	Review PREPA 1986 reply in further support of protective order regarding Utier requests involving issues related to fuel suppliers litigation.	1.10	765.00	841.50
05/13/20	JHG	Review email from S. Siff attaching ECF 1987 in 17-4780 and review document.	0.30	765.00	229.50
05/14/20	JHG	Review daily summary from S. Siff to identify and analyze strategic litigation issues.	0.40	765.00	306.00
05/14/20	JHG	Review and analysis of ECF 13113, informative motion of government parties in AMBAC regarding relief from stay.	0.90	765.00	688.50
05/14/20	JA	Review Memorandum regarding appellate issues and equitable mootness issues	0.30	575.00	172.50
05/14/20	MGG	Review ECF 13113 adversary informative motion re: revenue bond lift stay motions.	0.20	575.00	115.00
05/15/20	JMS	Review Northern Trust [REDACTED] (1.4)	1.40	500.00	700.00
05/17/20	JA	Attention to determining expert role in Kobre Kim documents.	0.20	575.00	115.00
05/18/20	JHG	Review daily summary prepared by S. Siff to identify and analyze strategic litigation issues.	0.30	765.00	229.50
05/18/20	JHG	Review ECF 13125, unopposed motion of Assured Guaranty to supplement affidavit.	0.30	765.00	229.50

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05/18/20	JHG	Review and analyze email from Alex Bongartz and draft response to Oversight Board regarding PREPA.	0.80	765.00	612.00
05/18/20	JHG	Review additional daily summary prepared by S. Siff to identify and analyze strategic litigation issues.	0.60	765.00	459.00
05/18/20	JHG	Review ECF 13135, objection to Disclosure Statement.	0.60	765.00	459.00
05/18/20	JHG	Review ECF 13142, order modifying briefing schedule regarding motion to compel.	0.20	765.00	153.00
05/18/20	JHG	Review order on protective order regarding Utier and business judgment issue.	0.70	765.00	535.50
05/18/20	JHG	Review ECF 34 in case 19-004531, scheduling order and impact on Fuel Oil litigation.	0.60	765.00	459.00
05/18/20	JMS	Attention to [REDACTED] and continued development of litigation strategy.	1.80	500.00	900.00
05/18/20	AMC	Research and analyze Kobre Kim production with specific reference to SEC investigations into bond issuances of the Commonwealth.	0.80	375.00	300.00
05/18/20	JZ	Receipt and review of FOMB's Informative Motion Regarding Motion Requesting Relief From Stay [ECF No. 13121]; circulate same; update electronic case profile.	0.30	195.00	58.50
05/19/20	JHG	Review email from Alex Bongartz and attached ECF 1995 in Adv. 17-04780.	0.60	765.00	459.00
05/19/20	AMC	Review of revised [REDACTED]	0.40	375.00	150.00
05/19/20	JNS	Phone call and email to attorney Angelo Castaldi regarding confirmation of active Tolling Agreements with McConnel Valdes, LLC and O'Neill Borges, LLC	0.30	75.00	22.50
05/20/20	JHG	Review ECF 13186, supplemental declaration.	0.20	765.00	153.00
05/20/20	JHG	Review daily summary from S. Siff to identify and analyze strategic litigation issues.	0.30	765.00	229.50
05/20/20	JNS	Attention to emails from Steve Stiff	0.10	75.00	7.50
05/21/20	JHG	Review email from Alex Bongartz outlining response to PREPA status report, motion for relief from stay regarding medical payments.	0.80	765.00	612.00
05/21/20	JA	Review motion supporting remand of 20-0047 regarding defendants and issues implicated in stayed litigation.	0.10	575.00	57.50
05/21/20	AMC	Conference call with Joyce Delgado regarding ongoing research projects.	0.10	375.00	37.50
05/21/20	AMC	Review/analyze FOMB reply in further support of Rule 9019 status report.	0.30	375.00	112.50

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05/21/20	JAD	Strategy and status conference with Angelo Castaldi regarding pending and upcoming legal issues.	0.10	315.00	31.50
05/22/20	JHG	Review daily summary from S. Siff to identify and analyze strategic litigation issues.	0.40	765.00	306.00
05/22/20	JHG	Review ECF 13157, FOMB's sur-reply regarding relief from automatic stay.	0.50	765.00	382.50
05/22/20	JHG	Review additional daily summary received from S. Siff to identify and analyze strategic litigation issues.	0.40	765.00	306.00
05/26/20	JHG	Review email from S. Siff to identify and analyze strategic litigation issues and review Employees withdrawal of motion to compel ECF 912 in 17-03566.	0.20	765.00	153.00
05/26/20	JHG	Review email from Alex Bongartz and review and analysis of case management order ECF 13217 and impact on potential litigation strategy.	1.10	765.00	841.50
05/26/20	JHG	Review daily summary prepared by S. Siff to identify and analyze strategic litigation issues.	0.40	765.00	306.00
05/26/20	JHG	Review ECF 2007 in 17-04780, PREPA, joint status report regarding discovery.	0.30	765.00	229.50
05/26/20	JHG	Review daily summary from S. Siff to identify and analyze strategic litigation issues.	0.30	765.00	229.50
05/26/20	JHG	Review ECF 13216, Ambac Assurance motion to file under seal.	0.20	765.00	153.00
05/26/20	JHG	Review ECF 13217 memorandum order regarding case management and administrative procedures and addendum.	0.40	765.00	306.00
05/26/20	JHG	Email from Alex Bongartz attached WST article.	0.30	765.00	229.50
05/26/20	JA	Review proposed status report regarding sealed information in 926 pleadings (.2); review and analyze court order on UCC 2019 motion as it relates to information concerning potential UCC claims and strategize regarding same (.8); correspond wit counsel for FOMB regarding proposed status report (.1)	1.00	575.00	575.00
05/26/20	JMS	Review order on Rule 2019 and analysis concerning [REDACTED]	2.40	500.00	1,200.00
05/26/20	AMC	Review and analysis of Order (DE 13217) concerning additional Rule 2019 disclosures by various creditor groups.	0.70	375.00	262.50
05/26/20	AMC	Review and analyze research regarding funding by FOMB to Puerto Rican municipalities.	0.20	375.00	75.00
05/26/20	AMC	In conjunction with potential novel arguments concerning nature, extent, and scope of security interests of certain bondholders in PROMESA / instrumentality revenues, review and analyze recently-filed replies and sur-replies of various parties in in interest as to briefings concerning Amended Motion Concerning Application of the Automatic Stay to the Revenues Securing PRIFA Rum Tax Bonds and Revenues Securing the CCDA Bonds Notice.	1.20	375.00	450.00

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05/26/20	JZ	Receipt and review of Memorandum Opinion and Order relating to UCC's 2019 motion [ECF No. 13217]; circulate same; update electronic case profile.	0.30	195.00	58.50
05/27/20	JA	Review Amber Adversary Complaint as it relates to potential claims of UCC (1.3); strategize regarding same (.5)	1.80	575.00	1,035.00
05/27/20	AMC	Attend to review / revision of mandatory status update and myriad communications with SEC counsel (and Committee counsel) concerning the same.	0.30	375.00	112.50
05/27/20	JZ	Receipt and review of UCC's and FOMB's Third Joint Status Report concerning certain Sealed Information that the Committee filed under seal in connection with its Motion for Order to Pursue Certain Causes of Action on Behalf of Commonwealth and Granting Related Relief [ECF 6325] and its Omnibus Reply of Official Committee of Unsecured Creditors in Support of Motion for Order Authorizing Committee to Pursue Certain Causes of Action on Behalf of Commonwealth and Granting Related Relief [ECF 6458]; circulate same; update electronic case profile.	0.40	195.00	78.00
05/28/20	JHG	Review email from Alex Bongartz regarding Ambac and Prepa issues.	0.70	765.00	535.50
05/28/20	JHG	Review ECF 2012 in 17-04780, sur-reply to Prepa omnibus reply.	0.80	765.00	612.00
05/28/20	AMC	Review and analyze adversary complaint filed by certain Monolines concerning the constitutionality of the PROMESA regime as a whole.	1.10	375.00	412.50
Subtotal: B191 / General Litigation			67.50		\$36,487.50
B210 / Debtors' Fiscal Plan					
05/18/20	MGG	Review ECF 13135: Objection filed by Arthur Samodovitz, to the Disclosure Statement (ECF 11947) filed by the FOMB.	0.20	575.00	115.00
Subtotal: B210 / Debtors' Fiscal Plan			0.20		\$115.00
B260 / Meetings of and Communications with Board					
05/06/20	JA	Participate in Committee Call and report on status.	0.50	575.00	287.50
05/13/20	JA	Committee Call	0.50	575.00	287.50
05/14/20	JA	Confer with Committee Chair (.4); prepare correspondence with Committee regarding Sculptor and AP 355 (.4)	0.80	575.00	460.00
05/27/20	JA	Confer with Committee regarding pending issues.	1.10	575.00	632.50
Subtotal: B260 / Meetings of and Communications with Board			2.90		\$1,667.50
B320 / Plan and Disclosure Statement					

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05/01/20	MGG	Review Oversight Board's Status Report ECF 13018 and proposed Disclosure Statement Schedule.	0.30	575.00	172.50
05/04/20	JA	Begin review of revised Fiscal Plan (1.2); review research regarding revised Fiscal Plan (.6)	1.80	575.00	1,035.00
05/05/20	JA	Continued review of Fiscal Plan.	2.20	575.00	1,265.00
05/08/20	EJ	Further document review and revisions to memorandum on COFINA objections and rulings.	0.80	475.00	380.00
05/13/20	EJ	Continued research for and drafting of memorandum on COFINA plan objections and resolutions.	2.60	475.00	1,235.00
Subtotal: B320 / Plan and Disclosure Statement			7.70		\$4,087.50
Total			226.60		\$75,162.50

Timekeeper Summary

<u>ID</u>	<u>Timekeeper Name</u>	<u>Title</u>	<u>BillHours</u>	<u>BillRate</u>	<u>BillAmount</u>
JHG	John H Genovese	Sr. Partner	26.30	765.00	20,119.50
JMS	Jesus M Suarez	Partner	6.10	500.00	3,050.00
ALG	Alfredo L Gonzalez	Partner	1.90	565.00	1,073.50
MGG	Mariaelena Gayo-Guitian	Partner	3.30	575.00	1,897.50
JA	John Arrastia	Partner	20.50	575.00	11,787.50
JAD	Joyce A Delgado	Associate	14.70	315.00	4,630.50
IRS	Irina R Sadovnic	Associate	1.90	350.00	665.00
AMC	Angelo M Castaldi	Associate	8.60	375.00	3,225.00
EJ	Eric Jacobs	Associate	3.40	475.00	1,615.00
JNS	Jessey N Sardina	Paralegal	0.80	75.00	60.00
CE	Carolyn Esser	Paralegal	1.90	150.00	285.00
CBH	Colleen B Hopkins	Paralegal	0.30	195.00	58.50
SS	Steve Siff	Paralegal	126.70	195.00	24,706.50
JZ	Johana Zamora	Paralegal	10.20	195.00	1,989.00
Total			226.60		\$75,162.50

Costs and incurrent and advanced

<u>Date</u>	<u>Description</u>	<u>Amount</u>
05/31/2020	Data management and hosting (12272-001) Trustpoint.One 20-04695	7,029.08

Total Costs incurrent and advanced **\$7,029.08**

Current Fees and Costs

\$82,191.58

Genovese Joblove & Battista, P.A.

100 Southeast Second Street, 44th Floor
Miami, Florida 33131
Telephone (305) 349-2300 Facsimile (305) 349-2310
Employer ID# 65-0518134

PROMESA - Official Committee of Unsecured Creditors

July 7, 2020
Please Refer to
Invoice Number: 98314

Attn:

GJB Tax ID No. 65-0518134

Re: PROMESA: Official Committee of Unsecured Creditors / PREPA Adversary - Puerto Rico Electric Power Authority

SUMMARY / REMITTANCE COPY

Client/Matter # 12272-002

PROMESA - Official Committee of Unsecured Creditors

PROMESA: Official Committee of Unsecured Creditors / PREPA Adversary - Puerto Rico Electric Power Authority

(Services rendered outside of Puerto Rico)

For fees for professional services for the period ending May 31, 2020	12,190.50
Costs incurred and advanced	
Current Fees and Costs Due	12,190.50

We encourage our clients to pay via ACH, however, in the event that you pay by check, please send payment to the remittance address below:

TO PROTECT AGAINST FRAUD, the Firm will not change its wiring instructions via email. We strongly encourage clients to confirm any change in wiring instructions by contacting Ken Forrest @ 305-349-2312 or via email @ kforrest@gjb-law.com and requesting written and verbal confirmation.

Wiring and ACH Instructions:

Bank Name: Biscayne Bank
Bank Telephone: 305-447-5050
Account Name: Genovese Joblove & Battista, P.A. - Operating
Routing Number : 066015767
Account Number : 21007711

Remittance Address:

Genovese Joblove & Battista, P.A.
100 Southeast Second Street, 44th Floor
Miami, Florida 33131

For payment, please reference the invoice, client and matter number(s) being paid.
Please refer all questions to Ken Forrest @ 305-349-2312 or via email @ kforrest@gjb-law.com

Genovese Joblove & Battista, P.A.

100 Southeast Second Street, 44th Floor
Miami, Florida 33131
Telephone (305) 349-2300 Facsimile (305) 349-2310
Employer ID# 65-0518134

PROMESA - Official Committee of Unsecured Creditors

July 7, 2020
Please Refer to
Invoice Number: 98314

Attn:

GJB Tax ID No. 65-0518134

Re: PROMESA: Official Committee of Unsecured Creditors / PREPA Adversary - Puerto Rico Electric Power Authority

FOR PROFESSIONAL SERVICES RENDERED
for the period ending May 31, 2020

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
B110 / Case Administration					
05/01/20	JZ	Conference with J. Arrastia regardig adjourned hearing on the PREPA 9019 hearing scheduled for June 2.	0.30	195.00	58.50
05/14/20	JZ	Attention to updating PROMESA charts and updating calendaring.	2.50	195.00	487.50
Subtotal: B110 / Case Administration			2.80		\$546.00
B155 / Court Hearings					
05/22/20	MGG	Review ECF 13211 and PREPA 2006 re: adjourning deadlines related to 9019 Motion.	0.10	575.00	57.50
Subtotal: B155 / Court Hearings			0.10		\$57.50
B190 / Other Contested Matters					
05/04/20	MGG	Review pleadings and deadlines in connection with PREPA 9019 motion (ECF 13023).	0.20	575.00	115.00
05/20/20	MGG	Review ECF 13198, PEPA 1998 re: Status Report of the Government Parties Regarding the COVID-19 Pandemic and the 9019 Motion (PREPA 1992); Committee's Response.	0.10	575.00	57.50
05/23/20	MGG	Review ECF No. 2006 Order Further Adjourning Deadlines Applicable to 9019 Motion.	0.10	575.00	57.50
Subtotal: B190 / Other Contested Matters			0.40		\$230.00
B191 / General Litigation					
05/01/20	JA	Review case file regarding intervention issues by Marrero plaintiffs (.6); review case file regarding stay issues (.6); strategize regarding recommended course of action (.6); review pending related case status concerning Vitrol claims against PREPA (.8).	2.60	575.00	1,495.00

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05/01/20	AMC	Review of papers filed in 19-ap-388 concerning stay, intervention, and going-forward case management issues.	1.30	375.00	487.50
05/01/20	AMC	Review, analyze, and summarize for internal distribution salient RSA provisions, as affecting existing GJB litigation.	3.80	375.00	1,425.00
05/04/20	JA	Review case history and status of pleadings (1.1); strategize on litigation proposal for stay and intervention (.8); strategize with Angelo Castaldi regarding conference with SCC (.4); review Vitol and prepare litigation as it relates to pending issues (.4); confer with SCC regarding Joint Conference Report (.4).	3.10	575.00	1,782.50
05/04/20	AMC	Attend to telephone conferences with Special Claims Committee concerning going-forward process in Adv. Proc. 19-388 (.4); follow up meeting with John Arrastia concerning the same (.4).	0.80	375.00	300.00
05/04/20	AMC	Review of appellate court (and related Title III) record and documents filed therein concerning Rule 23(f) classification petition.	0.60	375.00	225.00
05/05/20	AMC	Analyze scope and limitations of bankruptcy court's / Title III court's [REDACTED]	1.60	375.00	600.00
05/07/20	JA	Review and revise draft status report (.3); review various comments and revisions (.3)	0.60	575.00	345.00
05/08/20	JA	Finalize Joint Status Report (.2); review correspondence from counsel (.3); confer with local counsel (.2)	0.70	575.00	402.50
05/08/20	AMC	Analyze and develop discovery action plan regarding 19-388.	2.30	375.00	862.50
05/08/20	JZ	Receipt and review of Parties' Joint Status Report and Proposed Order on Case Management filed in the Fuel Oil ADV (19-388) [ECF No. 65]; circulate same; update electronic case profile.	0.40	195.00	78.00
05/11/20	JMS	Review issues related to Prepa RSA and Fuel Oil Litigation as they related to status report and litigation strategy with Marrerro plaintiffs.	2.40	500.00	1,200.00
05/12/20	AMC	Review of order extending deadline to file joint status report and communicate internally with paraprofessional staff concerning the same.	0.10	375.00	37.50
05/12/20	AMC	Analyze and develop litigation strategy with reference to discovery and pre-trial matters, and attend to research concerning kickback schemes consistent therewith.	2.30	375.00	862.50
05/12/20	JZ	Receipt and review of Order regarding Joint Status Report filed in the Fuel Oil ADV (19-388); circulate same; calendar deadlines; update calendar to remove canceled hearings; update electronic case profile.	0.40	195.00	78.00
05/13/20	JZ	Receipt and review of Motion for Release of Insurance Proceeds for Earthquake Losses [ECF No. 1988]; calendar deadlines; update electronic case profile.	0.30	195.00	58.50

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05/18/20	JA	Review draft motion relating to status report.	0.30	575.00	172.50
05/18/20	AMC	Review of joint status report and corresponding entered scheduling order in 19-00453 in matter than may implicate issues litigated in 19-388.	0.30	375.00	112.50
05/18/20	JZ	Attention to Joint Status Report in the PREPA case [ECF No. 1992] ; calendar deadline to file status report and remove adjourned deadlines; update electronic case profile.	0.40	195.00	78.00
05/19/20	JZ	Receipt and review of UCC's Response to Commonwealth's Status Report regarding Covid 19 and the impact on the PREPA 9019 Motion; circulate same; update electronic case profile.	0.30	195.00	58.50
05/20/20	JA	Email correspondence from Brown Rudnick regarding stay (.1); review order scheduling briefing (.1)	0.20	575.00	115.00
05/20/20	JZ	Receipt and review of Order Setting Briefing Schedule in connection with the Status Report of the Government Parties Regarding the COVID-19 Pandemic and the 9019 Motion [ECF No. 1998; circulate same; calendar deadline to file reply and deadline to submit another status report; update electronic case profile.	0.30	195.00	58.50
05/21/20	JA	Review Reply to Response of UCC to Status Report of FOMB (.2); review Order ECF 13203 against defendants and issues tied to AP 283 (.1)	0.30	575.00	172.50
05/21/20	JZ	Receipt and review of FOMB's Reply to the UCC's Response to the Status Report of the Government Parties Regarding the Covid-19 Pandemic and the 9019 Motion [ECF No. 9002]; circulate same; update electronic case profile.	0.40	195.00	78.00
05/22/20	JA	Review order adjourning 9019 hearing.	0.10	575.00	57.50
05/22/20	JZ	Receipt and review of Order Further Adjourning Deadlines relating to PREPA 9019 and adjourning June 3rd hearing on certain Motions to Dismiss Amended Complaints in Adversary Cases; calendar deadlines; update June 3rd hearing calendar; e-mails to and from S. Siff regarding order and revenue bond complaints; update electronic case profile.	0.60	195.00	117.00
05/27/20	JZ	Conference with J. Arrastia regarding the adversary complaint filed by Ambac in PREPA and strategy relating to future filings under same actions.	0.50	195.00	97.50
Subtotal: B191 / General Litigation			27.00		\$11,357.00
Total			30.30		\$12,190.50

PROMESA - Official Committee of Unsecured Creditors
12272-002
Invoice No. 98314

Page 4

Timekeeper Summary

<u>ID</u>	<u>Timekeeper Name</u>	<u>Title</u>	<u>BillHours</u>	<u>BillRate</u>	<u>BillAmount</u>
JMS	Jesus M Suarez	Partner	2.40	500.00	1,200.00
MGG	Mariaelena Gayo-Guitian	Partner	0.50	575.00	287.50
JA	John Arrastia	Partner	7.90	575.00	4,542.50
AMC	Angelo M Castaldi	Associate	13.10	375.00	4,912.50
JZ	Johana Zamora	Paralegal	6.40	195.00	1,248.00
	Total		30.30		\$12,190.50

Current Fees and Costs

\$12,190.50

Genovese Joblove & Battista, P.A.

100 Southeast Second Street, 44th Floor
Miami, Florida 33131
Telephone (305) 349-2300 Facsimile (305) 349-2310
Employer ID# 65-0518134

PROMESA - Official Committee of Unsecured Creditors

July 7, 2020
Please Refer to
Invoice Number: 98315

Attn:

GJB Tax ID No. 65-0518134

Re: PROMESA: Official Committee of Unsecured Creditors / ERS Litigation - Employees Retirement System of the
~~Government - Commonwealth of Puerto Rico~~

SUMMARY / REMITTANCE COPY

Client/Matter # 12272-003

PROMESA - Official Committee of Unsecured Creditors

PROMESA: Official Committee of Unsecured Creditors / ERS Litigation - Employees Retirement System of the Government
Commonwealth of Puerto Rico

(Services rendered outside of Puerto Rico)

For fees for professional services
for the period ending May 31, 2020

4,532.50

Costs incurred and advanced

Current Fees and Costs Due

4,532.50

We encourage our clients to pay via ACH, however, in the event that you pay by check, please send payment to the remittance address below:

TO PROTECT AGAINST FRAUD, the Firm will not change its wiring instructions via email. We strongly encourage clients to confirm any change in wiring instructions by contacting Ken Forrest @ 305-349-2312 or via email @ kforrest@gjb-law.com and requesting written and verbal confirmation.

Wiring and ACH Instructions:

Bank Name: Biscayne Bank
Bank Telephone: 305-447-5050
Account Name: Genovese Joblove & Battista, P.A. - Operating
Routing Number : 066015767
Account Number : 21007711

Remittance Address:

Genovese Joblove & Battista, P.A.
100 Southeast Second Street, 44th Floor
Miami, Florida 33131

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Genovese Joblove & Battista, P.A.

100 Southeast Second Street, 44th Floor
Miami, Florida 33131
Telephone (305) 349-2300 Facsimile (305) 349-2310
Employer ID# 65-0518134

PROMESA - Official Committee of Unsecured Creditors

July 7, 2020
Please Refer to
Invoice Number: 98315

Attn:

GJB Tax ID No. 65-0518134

Re: PROMESA: Official Committee of Unsecured Creditors / ERS Litigation - Employees Retirement System of the
~~Government Commonwealth of Puerto Rico~~

FOR PROFESSIONAL SERVICES RENDERED
for the period ending May 31, 2020

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
B191 / General Litigation					
05/01/20	JA	Review various correspondence regarding pending discovery issues.	0.10	575.00	57.50
05/03/20	JA	Receive discovery production.	0.10	575.00	57.50
05/06/20	JA	Review correspondence regarding discovery disputes.	0.20	575.00	115.00
05/06/20	IRS	Prepare correspondence to co-plaintiff's counsel regarding ECF No. 12901, Order setting briefing schedule in certain ERS matters.	0.30	350.00	105.00
05/06/20	JZ	Receipt and review of Motion to Compel Deposition Testimony by ERS Bondholders and the Supplement of the ERS Bondholders' Privilege Logs [ECF No. 895]; circulate same; update electronic case profile.	0.30	195.00	58.50
05/07/20	JA	Review Motion to Compel Deposition Testimony by ERS Bondholders and Supplement to Privilege Log (.8); review Urgent Motion to Review Briefing Schedule (.2); review Order Adjourning Lift Stay (.1)	1.10	575.00	632.50
05/07/20	IRS	Prepare correspondence to SCC counsel regarding scheduling orders and pending motions' deadlines. (.2)	0.50	350.00	175.00
		Phone conference with SCC counsel regarding pending discovery disputed with ERS bondholders and other general workflow and internal organization charts. (.3)			
05/07/20	JZ	Receipt and review of Urgent Motion to Set Briefing Schedule on the Motion to Compel Deposition Testimony by ERS Bondholders and the Supplement of the ERS Bondholders' Privilege Logs [ECF No. 896]; receipt and review of Order Setting Briefing Schedule [ECF No. 897]; circulate same; calendar deadlines; update electronic case profile.	0.30	195.00	58.50

PROMESA - Official Committee of Unsecured Creditors
12272-003
Invoice No. 98315

Page 2

05/08/20	JA	Review Order Establishing Briefing Schedule (ERS 897).	0.10	575.00	57.50
05/08/20	JZ	Receipt and review of Informative Motion relating to the Deposition Testimony By ERS Bondholders, wherein the parties advise the Court that they agree to attend mediation on the Government Parties Motion to Compel and proposed a briefing schedule is the issues are not resolve [ECF 901]; circulate same; update electronic case profile.	0.30	195.00	58.50
05/11/20	JA	Attention to Sculptor amendment to caption to remove party; confer with Nick Bassett.	0.40	575.00	230.00
05/11/20	JA	Review Order Setting Briefing Schedule in AP 283 (.1); review discovery correspondence (.1); review draft stipulation regarding depositions (.2)	0.40	575.00	230.00
05/11/20	JZ	Receipt and review of Order Setting Briefing Schedule on Puerto Rico to Compel Deposition Testimony by ERS Bondholders [ECF No. 13080]; calendar deadlines; update electronic case profile.	0.30	195.00	58.50
05/12/20	JA	Confer with Nick Bassett regarding potential expert.	0.10	575.00	57.50
05/12/20	JA	Attend to Sculptor Capital Management dismissal and service issues (.3); confer with committee counsel (.2); strategize with A. Castaldi (.1)	0.60	575.00	345.00
05/13/20	JA	Analyze pending issues regarding Sculptor claims and Northern Trust as proper defendant in AP 355 (.6); review various correspondence regarding deposition exhibits (.2); confer with Committee Chair regarding Sculptor complaint issues [APP 355] (.3)	1.10	575.00	632.50
05/14/20	JZ	Receipt and review of Joint Urgent Motion to Extend Briefing Schedule on the Urgent Motion to Compel Deposition Testimony by ERS Bondholders (ECF 910); circulate same; update electronic case profile.	0.30	195.00	58.50
05/15/20	JA	Confer with Tristen Axelrod regarding Sculptor and AP 355 (.3); finalize action plan on AP 355 (.4); finalize draft Motion to Amend (.1); confer with counsel for Sculptor (.3)	1.10	575.00	632.50
05/15/20	AMC	Review of court orders concerning discovery process and confer internally concerning dismissal procedure thereunder.	0.40	375.00	150.00
05/15/20	AMC	Conference call with counsel for adversary defendant.	0.30	375.00	112.50
05/18/20	JZ	Receipt and review of Court's Order Modifying Briefing Schedule on the Joint Urgent Motion to Extend Briefing Schedule on the Urgent Motion to Compel Deposition Testimony by ERS Bondholders (ECF 911); circulate same; calendar deadlines; update electronic case profile.	0.40	195.00	78.00
05/19/20	AMC	Attend to communications internally and externally with opposing counsel concerning complaint amendment.	0.20	375.00	75.00
05/20/20	JA	Confer with opposing counsel regarding dismissal.	0.10	575.00	57.50

PROMESA - Official Committee of Unsecured Creditors
12272-003
Invoice No. 98315

Page 3

05/22/20	JZ	Receipt and review of Notice of Withdrawal, without prejudice of the Motion of the Official Committee of Retired Employees of the Commonwealth of Puerto Rico, the Financial Oversight and Management Board of Puerto Rico as Representative of the Employees Retirement System of the Government of the Commonwealth of Puerto Rico, the Official Committee of Unsecured Creditors, and the Special Claims Committee of the Financial Oversight and Management Board for Puerto Rico to Compel Deposition Testimony by ERS Bondholders and the Supplement of the ERS Bondholders' Privilege Logs (ECF. No. 895), in light of the parties' agreement with regard to the Motion to Compel; circulate same; update electronic case profile.	0.30	195.00	58.50
05/26/20	JZ	Revise and format Amended Complaint in 19-355; e-mail same to A. Castaldi for review.	0.80	195.00	156.00
05/27/20	AMC	Review / revise amended ERS complaint for filing in 19-355.	0.30	375.00	112.50
Subtotal: B191 / General Litigation			10.40		\$4,420.00
B260 / Meetings of and Communications with Board					
05/12/20	AMC	Attend to Committee communication concerning status of ERS litigation.	0.30	375.00	112.50
Subtotal: B260 / Meetings of and Communications with Board			0.30		\$112.50
Total			10.70		\$4,532.50

Timekeeper Summary

<u>ID</u>	<u>Timekeeper Name</u>	<u>Title</u>	<u>BillHours</u>	<u>BillRate</u>	<u>BillAmount</u>
JA	John Arrastia	Partner	5.40	575.00	3,105.00
IRS	Irina R Sadovnic	Associate	0.80	350.00	280.00
AMC	Angelo M Castaldi	Associate	1.50	375.00	562.50
JZ	Johana Zamora	Paralegal	3.00	195.00	585.00
Total			10.70		\$4,532.50

Current Fees and Costs

\$4,532.50

Genovese Joblove & Battista, P.A.

100 Southeast Second Street, 44th Floor
Miami, Florida 33131
Telephone (305) 349-2300 Facsimile (305) 349-2310
Employer ID# 65-0518134

PROMESA - Official Committee of Unsecured Creditors

July 7, 2020
Please Refer to
Invoice Number: 98316

Attn:

GJB Tax ID No. 65-0518134

Re: PROMESA: Official Committee of Unsecured Creditors / HTA Litigation - Puerto Rico Highways & Transportation Authority

SUMMARY / REMITTANCE COPY

Client/Matter # 12272-004

PROMESA - Official Committee of Unsecured Creditors

PROMESA: Official Committee of Unsecured Creditors / HTA Litigation - Puerto Rico Highways & Transportation Authority

(Services rendered outside of Puerto Rico)

For fees for professional services for the period ending May 31, 2020	981.00
Costs incurred and advanced	
Current Fees and Costs Due	981.00

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Wiring and ACH Instructions:

Bank Name: Biscayne Bank
Bank Telephone: 305-447-5050
Account Name: Genovese Joblove & Battista, P.A. - Operating
Routing Number : 066015767
Account Number : 21007711

Remittance Address:

Genovese Joblove & Battista, P.A.
100 Southeast Second Street, 44th Floor
Miami, Florida 33131

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Genovese Joblove & Battista, P.A.

100 Southeast Second Street, 44th Floor
Miami, Florida 33131
Telephone (305) 349-2300 Facsimile (305) 349-2310
Employer ID# 65-0518134

PROMESA - Official Committee of Unsecured Creditors

July 7, 2020
Please Refer to
Invoice Number: 98316

Attn:

GJB Tax ID No. 65-0518134

Re: PROMESA: Official Committee of Unsecured Creditors / HTA Litigation - Puerto Rico Highways & Transportation
Authority

FOR PROFESSIONAL SERVICES RENDERED
for the period ending May 31, 2020

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
B110 / Case Administration					
05/07/20	JZ	Review of calendar; e-mails to and from J. Arrastia regarding deadline to participate in the May 13th hearing on the Lift Stay Motions and telephonic attendance at same.	0.30	195.00	58.50
Subtotal: B110 / Case Administration			0.30		\$58.50
B191 / General Litigation					
05/04/20	AMC	Preliminary review of AMBAC reply in further support of motion for relief from stay concerning "gating issue" of bondholder entitlement to priority / secured status as to HTA excise and toll revenues.	0.30	375.00	112.50
05/06/20	JZ	Receipt and review of Urgent Motion of the Government Parties for Leave to File Sur-Replies and to Adjourn the Preliminary Hearing Regarding the Revenue Bond Lift Stay Motions to June 4, 2020 [ECF No. 788]; calendar deadlines contained in order; circulate same; update electronic case profile.	0.70	195.00	136.50
05/07/20	JZ	Receipt and review of responses and replies in support to Urgent Motion of the Government Parties for Leave to File Sur-Replies and to Adjourn the Preliminary Hearing Regarding the Revenue Bond Lift Stay Motions; circulate electronic case profile.	0.50	195.00	97.50
05/08/20	JZ	Receipt and review of Order Granting Urgent Motion of the Government Parties for Leave to File Sur-Replies and to Adjourn the Preliminary Hearing Regarding the Revenue Bond Lift Stay Motions to June 4, 2020 [ECF No. 799]; calendar hearing date and deadlines contained in order; circulate same; update electronic case profile.	0.60	195.00	117.00
05/13/20	AMC	Review and analyze all filings pertaining to HTA Lift Stay Motion, and Orders concerning scheduling of preliminary hearing.	0.60	375.00	225.00

PROMESA - Official Committee of Unsecured Creditors
12272-004
Invoice No. 98316

Page 2

05/13/20	JZ	Receipt and review of to inform in Compliance with Order Granting Opposed Urgent Motion of the Government Parties for Leave to File Sur-Replies and to Adjourn the Preliminary Hearing regarding the Revenue Bond Lift Stay Motions to June 4, 2020 [ECF No. 803]; circulate same; update electronic case profile.	0.30	195.00	58.50
05/14/20	JZ	Receipt and review of Court's Order Granting the Joint Informative Motion in Compliance with Order Granting Opposed Urgent Motion of the Government Parties for Leave to File Sur-Replies and to Adjourn the Preliminary Hearing Regarding the Revenue Bond Lift Stay Motions [ECF No. 805]; calendar all deadlines and hearing; compare order to previous revenue bond order {ECF 13068}; discussion with I. Sadovnic regarding our role and calendaring; circulate electronic case profile.	0.90	195.00	175.50
Subtotal: B191 / General Litigation			3.90		\$922.50
Total			4.20		\$981.00

Timekeeper Summary

<u>ID</u>	<u>Timekeeper Name</u>	<u>Title</u>	<u>BillHours</u>	<u>BillRate</u>	<u>BillAmount</u>
AMC	Angelo M Castaldi	Associate	0.90	375.00	337.50
JZ	Johana Zamora	Paralegal	3.30	195.00	643.50
Total			4.20		\$981.00

Current Fees and Costs

\$981.00

Genovese Joblove & Battista, P.A.

100 Southeast Second Street, 44th Floor
Miami, Florida 33131
Telephone (305) 349-2300 Facsimile (305) 349-2310
Employer ID# 65-0518134

PROMESA - Official Committee of Unsecured Creditors

August 4, 2020
Please Refer to
Invoice Number: 98609

Attn:

GJB Tax ID No. 65-0518134

Re: PROMESA: Official Committee of Unsecured Creditors / Special Conflict Counsel

SUMMARY / REMITTANCE COPY

Client/Matter # 12272-001
PROMESA - Official Committee of Unsecured Creditors
PROMESA: Official Committee of Unsecured Creditors / Special Conflict Counsel

(Services rendered outside of Puerto Rico)

For fees for professional services for the period ending Jun 30, 2020	57,089.00
Costs incurred and advanced	<u>15,434.36</u>
Current Fees and Costs Due	72,523.36

We encourage our clients to pay via ACH, however, in the event that you pay by check, please send payment to the remittance address below:

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Account Number : 21007711

Remittance Address:

Genovese Joblove & Battista, P.A.
100 Southeast Second Street, 44th Floor
Miami, Florida 33131

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Miami, Florida 33131
Telephone (305) 349-2300 Facsimile (305) 349-2310
Employer ID# 65-0518134

PROMESA - Official Committee of Unsecured Creditors

August 4, 2020
Please Refer to
Invoice Number: 98609

Attn:

GJB Tax ID No. 65-0518134

Re: PROMESA: Official Committee of Unsecured Creditors / Special Conflict Counsel

FOR PROFESSIONAL SERVICES RENDERED
for the period ending Jun 30, 2020

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
B110 / Case Administration					
06/01/20	JZ	Review of internal memo circulated by S. Siff.	0.30	195.00	58.50
06/03/20	JZ	Review of internal memo circulated by S. Siff.	0.40	195.00	78.00
06/04/20	IRS	Receipt and review docket entry updates and recent order summaries prepared by S. Siff.	0.30	350.00	105.00
06/04/20	JZ	Review of internal memo circulated by S. Siff.	0.40	195.00	78.00
06/05/20	JZ	Review of internal memo circulated by S. Siff.	0.30	195.00	58.50
06/09/20	JMS	Conference with J. Zamora to discuss organization and strategy moving forward.	0.50	500.00	250.00
06/09/20	JZ	Conference with J. Suarez to discuss organization and strategy moving forward.	0.50	195.00	97.50
06/09/20	JZ	Review of internal memo circulated by S. Siff.	0.40	195.00	78.00
06/10/20	JZ	Review of internal memo circulated by S. Siff.	0.20	195.00	39.00
06/11/20	JZ	Review of internal memo circulated by S. Siff.	0.40	195.00	78.00
06/12/20	JZ	Receipt and review of internal memo circulated by S. Siff.	0.20	195.00	39.00
06/15/20	MGG	Review Twelfth Amended Notice, Case Management and Administrative Procedures, dated June 6, 2020 (ECF 13383) and scheduled dates for Omnibus Hearings through December 2021.	0.10	575.00	57.50

PROMESA - Official Committee of Unsecured Creditors
12272-001
Invoice No. 98609

Page 2

06/15/20	JZ	Receipt and review of Court's Notice of its intent to amend the Twelfth Amended Notice, Case Management and Administrative Procedures; calendar deadline to object; update electronic case profile.	0.30	195.00	58.50
06/15/20	JZ	Review of internal memo circulated by S. Siff.	0.40	195.00	78.00
06/16/20	JZ	Review of internal memo circulated by J. Delgado..	0.50	195.00	97.50
06/17/20	JZ	Review of internal memo circulated by J. Delgado.	0.40	195.00	78.00
06/18/20	JZ	Review of internal memo circulated by J. Delgado.	0.30	195.00	58.50
06/22/20	JZ	Review of internal memo circulated by J. Delgado.	0.30	195.00	58.50
06/23/20	MGG	Receipt and review email Order ERS Discovery and Briefing Schedule and mediation before Judge House ECF 13475.	0.20	575.00	115.00
06/23/20	JZ	Review of internal memo circulated by J. Delgado.	0.40	195.00	78.00
06/24/20	JZ	Review of internal memo circulated by J. Delgado.	0.30	195.00	58.50
06/24/20	JZ	Receipt and review of Second Notice of Proposed Amendment to Twelfth Amended Case Management Procedures [ECF No. 13496]; calendar objection deadline; update electronic case profile.	0.30	195.00	58.50
06/25/20	JZ	Review of internal memo circulated by J. Delgado.	0.40	195.00	78.00
06/26/20	JZ	Review of internal memo circulated by J. Delgado.	0.40	195.00	78.00
06/29/20	JZ	Review of memo circulated by J. Delgado.	0.30	195.00	58.50
06/30/20	JZ	Receipt and review of Thirteenth Amended Case Management Procedures (.3); calendar 2021 omnibus hearing dates (.3); circulate filing and update electronic case profile (.1)/	0.70	195.00	136.50
06/30/20	JZ	Review of memo circulated by J. Delgado.	0.40	195.00	78.00
Subtotal: B110 / Case Administration			9.60		\$2,185.00
B112 / General Creditor Inquiries					
Subtotal: B112 / General Creditor Inquiries			0.00		\$0.00
B113 / Pleadings Review					

PROMESA - Official Committee of Unsecured Creditors
12272-001
Invoice No. 98609

Page 3

06/01/20	SS	Review and Analyze all court filings from late May 29 through May 31 in the Main Case, Title III cases and Adversary Proceedings in order to prepare digest of matters relevant to special litigation counsel and distribute to appropriate team members.	2.10	195.00	409.50
06/01/20	SS	Prepare digest of matters and filings from late May 29 through May 31 relevant to special litigation counsel and distribute to appropriate team members.	1.50	195.00	292.50
06/01/20	SS	Review and Analyze all court filings on June 1 in the Main Case, Title III cases and Adversary Proceedings in order to prepare digest of matters relevant to special litigation counsel and distribute to appropriate team members.	2.30	195.00	448.50
06/01/20	SS	Prepare digest of matters and filings on June 1 relevant to special litigation counsel and distribute to appropriate team members.	1.40	195.00	273.00
06/02/20	MGG	Receipt and review Status Report of Financial Oversight and Management Board in Connection with June 3, 2020 Omnibus Hearing.	0.30	575.00	172.50
06/02/20	SS	Review and Analyze all court filings on June 2 in the Main Case, Title III cases and Adversary Proceedings in order to prepare digest of matters relevant to special litigation counsel and distribute to appropriate team members.	2.60	195.00	507.00
06/02/20	SS	Prepare digest of matters and filings on June 2 relevant to special litigation counsel and distribute to appropriate team members.	1.30	195.00	253.50
06/02/20	SS	Review and Analyze all court filings from late on June 1 in the Main Case, Title III cases and Adversary Proceedings in order to prepare digest of matters relevant to special litigation counsel and distribute to appropriate team members.	2.20	195.00	429.00
06/02/20	SS	Prepare digest of matters and flings from late on June 1 relevant to special litigation counsel and distribute to appropriate team members.	1.30	195.00	253.50
06/03/20	SS	Review and Analyze all court filings late on June 3 in the Main Case, Title III cases and Adversary Proceedings in order to prepare digest of matters relevant to special litigation counsel and distribute to appropriate team members.	1.40	195.00	273.00
06/03/20	SS	prepare digest of matters and filings on June 3 relevant to special litigation counsel and distribute to appropriate team members.	1.10	195.00	214.50
06/03/20	SS	Review and Analyze all court filings from late on June 2 in the Main Case, Title III cases and Adversary Proceedings in order to prepare digest of matters relevant to special litigation counsel and distribute to appropriate team members.	2.50	195.00	487.50
06/03/20	SS	Prepare digest of matters and filings from late on June 2 relevant to special litigation counsel and distribute to appropriate team members.	1.50	195.00	292.50

PROMESA - Official Committee of Unsecured Creditors
12272-001
Invoice No. 98609

Page 4

06/04/20	SS	Review and Analyze all court filings on June 4 in the Main Case, Title III cases and Adversary Proceedings and prepare digest of matters relevant to special litigation counsel and distribute to appropriate team members.	1.50	195.00	292.50
06/04/20	SS	Prepare digest of matters and filings on June 4 relevant to special litigation counsel and distribute to appropriate team members.	1.10	195.00	214.50
06/04/20	SS	Review and Analyze all court filings from late on June 3 in the Main Case, Title III cases and Adversary Proceedings in order to prepare digest of matters relevant to special litigation counsel and distribute to appropriate team members.	1.10	195.00	214.50
06/04/20	SS	Prepare digest of matters and filings from late on June 3 relevant to special litigation counsel and distribute to appropriate team members.	0.30	195.00	58.50
06/05/20	SS	Review and Analyze all court filings on June 5 in the Main Case, Title III cases and Adversary Proceedings in order to prepare digest of matters relevant to special litigation counsel and distribute to appropriate team members.	2.20	195.00	429.00
06/05/20	SS	Prepare digest of matters and filings on June 5 relevant to special litigation counsel and distribute to appropriate team members.	1.10	195.00	214.50
06/05/20	SS	Prepare digest of matters and filings from late on June 4 relevant to special litigation counsel and distribute to appropriate team members.	1.70	195.00	331.50
06/05/20	SS	Prepare digest of matters and filings from late on June 4 relevant to special litigation counsel and distribute to appropriate team members.	1.20	195.00	234.00
06/06/20	SS	Began to review and analyze all court filings from late on June 5 in the Main Case, Title III cases and Adversary Proceedings in order to prepare digest of matters relevant to special litigation counsel and distribute to appropriate team members.	1.50	195.00	292.50
06/08/20	SS	Continued to Review and Analyze all court filings from late June 5 through June 7 in the Main Case, Title III cases and Adversary Proceedings and prepare digest of matters relevant to special litigation counsel and distribute to appropriate team members.	1.50	195.00	292.50
06/08/20	SS	Prepare digest of matters and filings from late on June 5 through June 7 relevant to special litigation counsel and distribute to appropriate team members.	1.10	195.00	214.50
06/08/20	SS	Review and Analyze all court filings on June 8 in the Main Case, Title III cases and Adversary Proceedings in order to prepare digest of matters relevant to special litigation counsel and distribute to appropriate team members.	2.40	195.00	468.00
06/08/20	SS	Prepare digest of matters and filings on June 8 relevant to special litigation counsel and distribute to appropriate team members.	2.10	195.00	409.50

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06/09/20	SS	Review and Analyze all court filings from late on June 8 in the Main Case, Title III cases and Adversary Proceedings in order to prepare digest of matters relevant to special litigation counsel and distribute to appropriate team members.	2.00	195.00	390.00
06/09/20	SS	Prepare digest of matters and filings from late on June 8 relevant to special litigation counsel and distribute to appropriate team members.	1.30	195.00	253.50
06/09/20	SS	Review and Analyze all court filings on June 9 in the Main Case, Title III cases and Adversary Proceedings in order to prepare digest of matters relevant to special litigation counsel and distribute to appropriate team members.	2.40	195.00	468.00
06/09/20	SS	Prepare digest of matters and filings on June 9 relevant to special litigation counsel and distribute to appropriate team members.	1.50	195.00	292.50
06/10/20	SS	Review and Analyze all court filings from late on June 9 in the Main Case, Title III cases and Adversary Proceedings in order to prepare digest of matters relevant to special litigation counsel and distribute to appropriate team members.	2.60	195.00	507.00
06/10/20	SS	Prepare digest of matters and filings from late on June 9 relevant to special litigation counsel and distribute to appropriate team members.	0.50	195.00	97.50
06/10/20	SS	Review and Analyze all court filings on June 10 in the Main Case, Title III cases and Adversary Proceedings in order to prepare digest of matters relevant to special litigation counsel and distribute to appropriate team members.	2.60	195.00	507.00
06/10/20	SS	Prepare digest of matters and filings on June 10 relevant to special litigation counsel and distribute to appropriate team members.	1.70	195.00	331.50
06/11/20	SS	Review and Analyze all court filings from late on June 10 in the Main Case, Title III cases and Adversary Proceedings in order to prepare digest of matters relevant to special litigation counsel and distribute to appropriate team members.	2.40	195.00	468.00
06/11/20	SS	Prepare digest of matters and filings from late on June 10 relevant to special litigation counsel and distribute to appropriate team members.	1.00	195.00	195.00
06/11/20	SS	Review and Analyze all court filings on June 11 in the Main Case, Title III cases and Adversary Proceedings in order to prepare digest of matters relevant to special litigation counsel and distribute to appropriate team members.	2.50	195.00	487.50
06/11/20	SS	Prepare digest of matters and filings on June 11 relevant to special litigation counsel and distribute to appropriate team members.	1.20	195.00	234.00

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06/12/20	SS	Review and Analyze all court filings from late on June 11 in the Main Case, Title III cases and Adversary Proceedings in order to prepare digest of matters relevant to special litigation counsel and distribute to appropriate team members.	1.30	195.00	253.50
06/12/20	SS	Prepare digest of matters and filings from late on June 11 relevant to special litigation counsel and distribute to appropriate team members.	0.80	195.00	156.00
06/12/20	SS	Review and Analyze all court filings on June 12 in the Main Case, Title III cases and Adversary Proceedings in order to prepare digest of matters relevant to special litigation counsel and distribute to appropriate team members.	1.20	195.00	234.00
06/12/20	SS	Prepare digest of matters and filings on June 12 relevant to special litigation counsel and distribute to appropriate team members.	0.70	195.00	136.50
06/15/20	JAD	Review and analyze all court filings in Main Case, Title III cases, and adversary proceedings for June 13, 2020 - June 15, 2020, in order to prepare digest of matters relevant to special litigation counsel, prepare digest of filings, direct paraprofessionals to calendar appropriate deadlines, and circulate summary	3.60	315.00	1,134.00
06/16/20	JAD	Review and analyze all court filings in Main Case, Title III cases, and adversary proceedings for June 16, 2020 in order to prepare digest of matters relevant to special litigation counsel, prepare digest of filings, direct paraprofessionals to calendar appropriate deadlines, and circulate summary.	2.20	315.00	693.00
06/17/20	JAD	Review and analyze all court filings in Main Case, Title III cases, and adversary proceedings for June 17, 2020 in order to prepare digest of matters relevant to special litigation counsel, prepare digest of filings, direct paraprofessionals to calendar appropriate deadlines, and circulate summary.	1.80	315.00	567.00
06/18/20	JAD	Review and analyze all court filings in Main Case, Title III cases, and adversary proceedings for June 18, 2020 in order to prepare digest of matters relevant to special litigation counsel, prepare digest of filings, direct paraprofessionals to calendar appropriate deadlines, and circulate summary.	1.60	315.00	504.00
06/19/20	JAD	Review and analyze all court filings in Main Case, Title III cases, and adversary proceedings for June 19, 2020 in order to prepare digest of matters relevant to special litigation counsel, prepare digest of filings, direct paraprofessionals to calendar appropriate deadlines, and circulate summary. .	1.30	315.00	409.50

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06/22/20	JAD	Review and analyze all court filings in Main Case, Title III cases, and adversary proceedings for June 22, 2020 in order to prepare digest of matters relevant to special litigation counsel, prepare digest of filings, direct paraprofessionals to calendar appropriate deadlines, and circulate summary.	1.80	315.00	567.00
06/23/20	JAD	Review and analyze all court filings in Main Case, Title III cases, and adversary proceedings for June 23, 2020 in order to prepare digest of matters relevant to special litigation counsel, prepare digest of filings, direct paraprofessionals to calendar appropriate deadlines, and circulate summary. (1.6) Analyze case status of several adversary proceedings with J. Suarez relating to GJB's role as co-plaintiff (.2)	1.80	315.00	567.00
06/24/20	JAD	Review and analyze all court filings in Main Case, Title III cases, and adversary proceedings for June 24, 2020 in order to prepare digest of matters relevant to special litigation counsel, prepare digest of filings, direct paraprofessionals to calendar appropriate deadlines, and circulate summary.	0.70	315.00	220.50
06/25/20	JAD	Review and analyze all court filings in Main Case, Title III cases, and adversary proceedings for June 25, 2020 in order to prepare digest of matters relevant to special litigation counsel, prepare digest of filings, direct paraprofessionals to calendar appropriate deadlines, and circulate summary.	0.60	315.00	189.00
06/26/20	JAD	Review and analyze all court filings in Main Case, Title III cases, and adversary proceedings for June 26, 2020 in order to prepare digest of matters relevant to special litigation counsel, prepare digest of filings, direct paraprofessionals to calendar appropriate deadlines, and circulate summary.	2.20	315.00	693.00
06/29/20	JAD	Review and analyze all court filings in Main Case, Title III cases, and adversary proceedings for June 29, 2020 in order to prepare digest of matters relevant to special litigation counsel, prepare digest of filings, direct paraprofessionals to calendar appropriate deadlines, and circulate summary.	3.40	315.00	1,071.00
06/30/20	JAD	Review and analyze all court filings in Main Case, Title III cases, and adversary proceedings for June 30, 2020 in order to prepare digest of matters relevant to special litigation counsel, prepare digest of filings, direct paraprofessionals to calendar appropriate deadlines, and circulate summary.	2.40	315.00	756.00
Subtotal: B113 / Pleadings Review			89.40		\$20,355.00

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B150 / Meetings of Creditors

06/03/20	JA	Confer with Committee regarding case issues and strategy.	0.50	575.00	287.50
06/12/20	JA	Confer and Strategize with [REDACTED] [REDACTED] 9	1.20	575.00	690.00
06/17/20	JA	Confer and strategize with Alvin Velazquez (.2); Committee call regarding case issues and strategy (.6)	0.80	575.00	460.00
06/24/20	JA	Confer with Committee regarding case issues.	0.50	575.00	287.50
Subtotal: B150 / Meetings of Creditors			3.00		\$1,725.00

B160 / Fee/Employment Applications

06/01/20	MGG	Review Court's Order approving Fee Examiner's Second Supplemental Report which includes GJB.	0.10	575.00	57.50
06/01/20	JZ	Receipt and review of Second Supplemental Omnibus Order Awarding Interim Allowance of Compensation [ECF No. 13296]; circulate same; update electronic case profile.	0.30	195.00	58.50
06/04/20	MGG	Email to and from John Arrastia re: February Invoices.	0.20	575.00	115.00
06/15/20	JA	Prepare initial memorandum regarding Kobre Kim review for Fee Examiner.	0.60	575.00	345.00
06/16/20	JA	Redact February Fee Statements (.6); revise March Fee Statements (1.2)	1.80	575.00	1,035.00
06/16/20	CE	Serve June Budget on the Fee Examiner and US Trustee group; E-mail correspondence with M. Guitian re: same.	0.30	150.00	45.00
06/16/20	CE	Serve the June 2020 Budget on Fee Examiner and US Trustee.	0.20	150.00	30.00
06/18/20	JA	Revise April Fee Statements.	1.30	575.00	747.50
06/18/20	MGG	Coordinate with Carolyn Esser re: Correspondence and email for Fee February Invoice.	0.50	575.00	287.50
06/18/20	CE	Serve GJB July 2020 Budget on Fee Examinder and US Trustee.	0.20	150.00	30.00
06/18/20	CE	Update Monthly Fee Cover Letter and exhibits for February and prepare summary e-mail. Follow up with M. Guitian.	0.60	150.00	90.00
06/23/20	CBH	Review of fee application deadline; e-mail to M. Guitian regarding current deadline and/or extension.	0.30	195.00	58.50
06/29/20	CBH	E-mail correspondence regarding fee application deadline and review of extension.	0.40	195.00	78.00
06/29/20	JZ	Conference with C. Hopkins regarding Fee Application deadline and invoices for same.	0.30	195.00	58.50

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Subtotal: B160 / Fee/Employment Applications			7.10		\$3,036.00
B161 / Budgeting					
06/04/20	MGG	Review status, approval and services of June and July Budgets.	0.30	575.00	172.50
06/15/20	JA	Prepare July budget.	0.60	575.00	345.00
06/16/20	MGG	Emails to and from John Arrastia re: submission of Budgets and Invoices.	0.30	575.00	172.50
Subtotal: B161 / Budgeting			1.20		\$690.00
B190 / Other Contested Matters					
06/02/20	AMC	Review and analysis of Status Report was filed by the FOMB and the AAFAF earlier this afternoon in response to the Court's order, dated May 26, 2020 [ECF No. 13220]	0.30	375.00	112.50
06/11/20	JA	Confer and strategize with J. Suarez, A. Castaldi, and J. Delgado regarding litigation strategy and plan relating to pending and anticipated matters.	1.20	575.00	690.00
06/12/20	AMC	Reviewed and analyzed the Court's Standing Order Regarding Procedures For Default Judgment Motion Practice regarding the procedures to follow in connection with seeking or defending a Default Judgment in the Adversary Proceedings	0.30	375.00	112.50
Subtotal: B190 / Other Contested Matters			1.80		\$915.00
B191 / General Litigation					
06/01/20	JHG	Review joint informative motion.	0.30	765.00	229.50
06/01/20	JHG	Review ECF 13296, second supplemental omnibus order.	0.30	765.00	229.50
06/01/20	JHG	Review email from Alex Bongartz and [REDACTED]	1.60	765.00	1,224.00
06/01/20	JHG	Review daily summary from S. Siff to identify and analyze strategic litigation issues.	0.30	765.00	229.50
06/01/20	JHG	Review ECF 12373, FOMB reply.	0.40	765.00	306.00
06/01/20	JHG	Review ECF 13279, joint stipulation regarding relief from stay regarding payments.	0.40	765.00	306.00
06/01/20	JHG	Review ECF 826, informative motion to supplement record.	0.30	765.00	229.50
06/01/20	JA	Review [REDACTED]	1.10	575.00	632.50

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06/01/20	AMC	Review and analyze [REDACTED] [REDACTED]	0.60	375.00	225.00
06/01/20	JZ	Receipt and review of Joint Information Motion related to participation at the June 3-4 Omnibus Hearing filed by the FOMB and the AAFAF [ECF No. 13281]; circulate same; update electronic case profile.	0.30	195.00	58.50
06/01/20	JZ	Receipt and review of the UCC's Motion related to participation at the June 3-4 Omnibus Hearing [ECF No. 13292]; circulate same; update electronic case profile.	0.30	195.00	58.50
06/01/20	JZ	Receipt and review of Agenda for the June 3-4 Omnibus hearings [ECF No. 13305]; circulate same; update electronic case profile.	0.40	195.00	78.00
06/02/20	JHG	Review daily summary prepared by S. Siff to identify and analyze strategic litigation issues.	0.30	765.00	229.50
06/02/20	JHG	Review ECF 13296, second supplemental order.	0.20	765.00	153.00
06/02/20	JHG	Review ECF 13303, regarding injunction and wraparound payments.	0.60	765.00	459.00
06/02/20	JA	Review FOMB status report (.1); review and revise AAFAF status report (.2); address dismissal of certain claims due to threshold points (.2); review AMBAC comment to Rule 2019 Disclosure Order (.1)	0.50	575.00	287.50
06/03/20	JHG	Review daily summary from S. Siff to identify and analyze strategic litigation issues.	0.30	765.00	229.50
06/03/20	JHG	Review ECF 13351, order on motion to seal regarding Ambac.	0.30	765.00	229.50
06/03/20	JHG	Review ECF 13353, status report regarding COVID and strategize regarding same.	0.60	765.00	459.00
06/03/20	JHG	Review ECF 13355, Assured motion regarding case management administrative procedures.	0.50	765.00	382.50
06/03/20	JHG	Review ECF 13357, Ad Hoc Group motion/GO Bonds and review of 2019 issues referenced in motion.	0.60	765.00	459.00
06/03/20	JHG	Review Doc 834, in HTA, orders on motion to seal.	0.40	765.00	306.00
06/03/20	JA	Attend portion of Omnibus relating to status reports.	0.70	575.00	402.50
06/03/20	JZ	Receipt and review of Status Report was filed by the FOMB and the AAFAF [ECF No. 13337]; circulate same; update electronic case profile.	0.30	195.00	58.50
06/03/20	JZ	Receipt and review of Responses to Notice Regarding Proposed Amendment to Eleventh Amended Notice and Case Management Procedures [ECF Nos. 13354, No. 13355 and 13357]; circulate same; update electronic case profile.	0.50	195.00	97.50

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06/05/20	JMS	Review issues arising from June omnibus and review related issues concerning pending adversaries.	1.40	500.00	700.00
06/08/20	JHG	Review daily summary prepared by S. Siff to identify and analyze strategic litigation issues, review ECF 13378.	0.40	765.00	306.00
06/09/20	JHG	Review daily summary prepared by S. Siff to identify and analyze strategic litigation issues.	0.40	765.00	306.00
06/09/20	JHG	Review complaint in Case 20-00078.	0.60	765.00	459.00
06/09/20	JHG	Review Ambac motion (ECF 13384) regarding redacted documents.	0.20	765.00	153.00
06/09/20	JHG	Review ECF 841 in adversary 17-03567, FOMB response regarding discovery documents and security interest issues.	0.90	765.00	688.50
06/11/20	JHG	Review daily summary from S. Siff to identify and analyze strategic litigation issues.	0.30	765.00	229.50
06/11/20	JHG	Review ECF 13398 in PBA regarding claims deadline.	0.20	765.00	153.00
06/11/20	JHG	Review ECF 13399 Commonwealth urgent motion regarding return date for filing information.	0.40	765.00	306.00
06/11/20	JHG	Review and analysis of Doc 917 in 17-03566 regarding ERS bondholder claims.	1.30	765.00	994.50
06/11/20	JMS	Review 2019 issues related to deadlines.	0.80	500.00	400.00
06/11/20	JMS	Attention to case management issues, scheduling deadlines pursuant to new case management order/2019 disclosures and review litigation issues accruing in adversary proceedings (1.9); meet with team re:litigation plan (.9).	2.80	500.00	1,400.00
06/11/20	JAD	Conference with John Arrastia, Jesus Suarez, and Angelo Castaldi to discuss case status, the viability of potential claims, and to develop long term strategy.	1.20	315.00	378.00
06/11/20	AMC	Conference with GJB team concerning matters handled by the Firm, including potential forthcoming contested matters to research / prepare for.	0.80	375.00	300.00
06/12/20	JHG	Review daily summary prepared by S. Siff to identify and analyze strategic litigation issues.	0.30	765.00	229.50
06/12/20	JMS	Review developments [REDACTED]	1.80	500.00	900.00
06/12/20	JA	Review Order regarding default judgment motion practice.	0.10	575.00	57.50
06/15/20	JHG	Review daily summary from S. Siff to identify and analyze strategic litigation issues.	0.20	765.00	153.00
06/15/20	JHG	Review ECF 13437, adversary complaint.	0.70	765.00	535.50

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06/15/20	JHG	Review email from Alex Bongartz.	0.10	765.00	76.50
06/15/20	JMS	Attention to tolling issues (.6); [REDACTED] (1.8)	2.40	500.00	1,200.00
06/15/20	JA	Review recap [REDACTED] (.6); Notice to Amend Case Management Order (.1)	0.70	575.00	402.50
06/16/20	JHG	Review and analysis of ECF 43 in adversary 19-0042 regarding actions against underwriters and request for oral argument.	0.40	765.00	306.00
06/16/20	JHG	Review daily summary from J. Delgado to identify and analyze strategic litigation issues.	0.30	765.00	229.50
06/16/20	JHG	Review ECF 13447, memorandum order to withdraw complaints regarding stay violation.	1.10	765.00	841.50
06/17/20	JHG	Review summary from S. Siff to analyze and identify strategic litigation issues.	0.20	765.00	153.00
06/17/20	JHG	Review ECF 13450 motion regarding protective order in Ambac proceeding.	0.30	765.00	229.50
06/17/20	JHG	Review email from Alex Bongartz and draft letter regarding House 234.	0.90	765.00	688.50
06/17/20	AMC	Review and analysis of various filings implicating the Firm's representation of the Committee, including: the motion of National Public Finance Guarantee Corporation and MBIA Insurance Corporation requesting oral argument on the pending Motion for Remand (ECF 31 19-00422) (.1); Court's Memorandum Order Granting the FOMB's Motion Pursuant to Bankruptcy Code Sections 105(a) and 362 for Order Directing Ambac to Withdraw Complaint (ECF 13447, HTA 845) (ECF 12569 and HTA 756, the "Motion") (.4); The Adversary Complaint filed in AP 20-00080 filed by the Hon. Wanda Hon. Wanda Vázquez Garced, in her official capacity as the Governor of the Commonwealth of Puerto Rico (the "Governor"), and the AAFAF against the FOMB seeking declaratory and injunctive relief (ECF 13437) (.8);	1.30	375.00	487.50
06/18/20	JHG	Review email from Alex Bongartz regarding status of ERS bondholder suit and analysis of same.	0.40	765.00	306.00
06/22/20	JHG	Review daily summary from J. Delgado to identify and analyze strategic litigation issues.	0.60	765.00	459.00
06/22/20	JHG	Review Ambac response regarding ERS joinder.	0.50	765.00	382.50
06/22/20	JHG	Review ECF 2036, joint motion regarding widerange relief from stay.	0.20	765.00	153.00
06/23/20	JHG	Review email from Alex Bongartz regarding e-discovery service, analysis of issues regarding assumption of energy contract and FCRC.	0.70	765.00	535.50

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06/23/20	JHG	Review daily summary from J. Delgado to identify and analyze strategic litigation issues.	0.60	765.00	459.00
06/23/20	JHG	Review revised scheduling dates regarding bondholder litigation discovery.	1.10	765.00	841.50
06/23/20	JMS	Review issues concerning case management deadlines and import on litigation where GJB is of counsel.	2.30	500.00	1,150.00
06/23/20	JAD	Strategize with head paralegal J. Zamora to discuss case status of various adversary proceedings to formulate tasks for ensuring appropriate calendaring of docket entries for potential response. (1.5)	1.50	315.00	472.50
		Review and analyze all court filings in Main Case, Title III cases, and adversary proceedings for June 23, 2020 in order to prepare digest of matters relevant to special litigation counsel, prepare digest of filings, direct paraprofessionals to calendar appropriate deadlines, and circulate summary. (1.6)			
		Analyze case status of several adversary proceedings with J. Suarez relating to GJB's role as co-plaintiff (.2)			
06/24/20	JHG	Review daily email summary from J. Delgado to identify and analyze strategic litigation issues.	0.50	765.00	382.50
06/24/20	JHG	Review ECF 19-00556, order modifying discovery.	0.30	765.00	229.50
06/24/20	JHG	Review ECF 13477, partial objection to case management filed by Assured, et al.	0.20	765.00	153.00
06/24/20	JHG	Review email from Alex Bongartz and analysis of ERS Ultra Vires issues.	1.30	765.00	994.50
06/29/20	JHG	Review daily summary prepared by J. Delgado to identify and analyze strategic litigation issues.	0.20	765.00	153.00
06/29/20	JHG	Review ECF 13507, stipulation regarding confidentiality with Ambac regarding ERS.	0.90	765.00	688.50
Subtotal: B191 / General Litigation			45.90		\$28,183.00
Total			158.00		\$57,089.00

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Timekeeper Summary

<u>ID</u>	<u>Timekeeper Name</u>	<u>Title</u>	<u>BillHours</u>	<u>BillRate</u>	<u>BillAmount</u>
JHG	John H Genovese	Sr. Partner	24.10	765.00	18,436.50
JMS	Jesus M Suarez	Partner	12.00	500.00	6,000.00
MGG	Mariaelena Gayo-Guitian	Partner	2.00	575.00	1,150.00
JA	John Arrastia	Partner	11.60	575.00	6,670.00
JAD	Joyce A Delgado	Associate	26.10	315.00	8,221.50
IRS	Irina R Sadovnic	Associate	0.30	350.00	105.00
AMC	Angelo M Castaldi	Associate	3.30	375.00	1,237.50
CE	Carolyn Esser	Paralegal	1.30	150.00	195.00
CBH	Colleen B Hopkins	Paralegal	0.70	195.00	136.50
SS	Steve Siff	Paralegal	65.70	195.00	12,811.50
JZ	Johana Zamora	Paralegal	10.90	195.00	2,125.50
Total			158.00		\$57,089.00

Costs and incurrent and advanced

<u>Date</u>	<u>Description</u>	<u>Amount</u>
	Pacer - Online Research	1,082.60
03/31/2020	Data management and hosting (12272-001) Trustpoint.One 20-03184	7,322.68
06/30/2020	Data management and hosting (12272-001) Trustpoint.One 20-05792	7,029.08
Total Costs incurrent and advanced		\$15,434.36
Current Fees and Costs		\$72,523.36

Genovese Joblove & Battista, P.A.

100 Southeast Second Street, 44th Floor
Miami, Florida 33131
Telephone (305) 349-2300 Facsimile (305) 349-2310
Employer ID# 65-0518134

PROMESA - Official Committee of Unsecured Creditors

August 4, 2020
Please Refer to
Invoice Number: 98602

Attn:

GJB Tax ID No. 65-0518134

Re: PROMESA: Official Committee of Unsecured Creditors / PREPA Adversary - Puerto Rico Electric Power Authority

SUMMARY / REMITTANCE COPY

Client/Matter # 12272-002

PROMESA - Official Committee of Unsecured Creditors

PROMESA: Official Committee of Unsecured Creditors / PREPA Adversary - Puerto Rico Electric Power Authority

(Services rendered outside of Puerto Rico)

For fees for professional services
for the period ending Jun 30, 2020

6,618.50

Costs incurred and advanced

55.20

Current Fees and Costs Due

6,673.70

We encourage our clients to pay via ACH, however, in the event that you pay by check, please send payment to the remittance address below:

TO PROTECT AGAINST FRAUD, the Firm will not change its wiring instructions via email. We strongly encourage clients to confirm any change in wiring instructions by contacting Ken Forrest @ 305-349-2312 or via email @ kforrest@gjb-law.com and requesting written and verbal confirmation.

Wiring and ACH Instructions:

Bank Name: Biscayne Bank
Bank Telephone: 305-447-5050
Account Name: Genovese Joblove & Battista, P.A. - Operating
Routing Number : 066015767
Account Number : 21007711

Remittance Address:

Genovese Joblove & Battista, P.A.
100 Southeast Second Street, 44th Floor
Miami, Florida 33131

For payment, please reference the invoice, client and matter number(s) being paid.
Please refer all questions to Ken Forrest @ 305-349-2312 or via email @ kforrest@gjb-law.com

Genovese Joblove & Battista, P.A.

100 Southeast Second Street, 44th Floor
Miami, Florida 33131
Telephone (305) 349-2300 Facsimile (305) 349-2310
Employer ID# 65-0518134

PROMESA - Official Committee of Unsecured Creditors

August 4, 2020
Please Refer to
Invoice Number: 98602

Attn:

GJB Tax ID No. 65-0518134

Re: PROMESA: Official Committee of Unsecured Creditors / PREPA Adversary - Puerto Rico Electric Power Authority

FOR PROFESSIONAL SERVICES RENDERED
for the period ending Jun 30, 2020

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
B113 / Pleadings Review					
06/16/20	SS	Prepare digest of matters and filings from late on June 15 relevant to special litigation counsel and distribute to appropriate team members.	1.20	195.00	234.00
Subtotal: B113 / Pleadings Review			1.20		\$234.00
B191 / General Litigation					
06/01/20	JHG	Review ECF 2019, PREPA opposition to Utier motion for sur-reply.	0.30	765.00	229.50
06/11/20	JA	Review Reply to Motion to Remand in AP 47 (.7); analyze impact of remand on claims in AP 280 and AP 388 brought by Committee (1.2); review remaining aspects of case file (1.3)	3.20	575.00	1,840.00
06/11/20	JMS	Continued review of issues arising in Fuel Oil Litigation and upcoming termination of stay (1.4) and track tolling issues (1.3)	2.70	500.00	1,350.00
06/15/20	JHG	Review issues regarding PREPA gas conversion project.	0.30	765.00	229.50
06/16/20	JA	Review Request for Oral Argument in AP 422, monitored for potential impact on AP 388.	0.10	575.00	57.50
06/18/20	JA	Review court order ECF 34 in AP 00453 as it relates to AP 388.	0.10	575.00	57.50
06/22/20	JHG	Review Prepa ECF 2037, joint motion.	0.20	765.00	153.00
06/22/20	JHG	Review Prepa (ECF 13471) memorandum order regarding urgent motion regarding assumption of electric and gas contracts.	0.80	765.00	612.00

PROMESA - Official Committee of Unsecured Creditors
12272-002
Invoice No. 98602

Page 2

06/22/20	JHG	Review Prepa order (ECF 13470) authorizing assumption of energy contracts and analyze as issues may relate to Prepa Fuel Oil litigation.	0.60	765.00	459.00
06/23/20	JHG	Review notice of service and ECF 87 in ERS regarding extended scheduling of discovery.	0.30	765.00	229.50
06/29/20	JHG	Review email from Alex Bongartz and draft Hinton expert report and secured status of ERS bondholders.	1.30	765.00	994.50
Subtotal: B191 / General Litigation			9.90		\$6,212.00
B210 / Debtors' Fiscal Plan					
06/29/20	MGG	Review Oversight Board certified fiscal plans for PREPA.	0.30	575.00	172.50
Subtotal: B210 / Debtors' Fiscal Plan			0.30		\$172.50
Total			11.40		\$6,618.50

Timekeeper Summary

<u>ID</u>	<u>Timekeeper Name</u>	<u>Title</u>	<u>BillHours</u>	<u>BillRate</u>	<u>BillAmount</u>
JHG	John H Genovese	Sr. Partner	3.80	765.00	2,907.00
JMS	Jesus M Suarez	Partner	2.70	500.00	1,350.00
MGG	Mariaelena Gayo-Guitian	Partner	0.30	575.00	172.50
JA	John Arrastia	Partner	3.40	575.00	1,955.00
SS	Steve Siff	Paralegal	1.20	195.00	234.00
Total			11.40		\$6,618.50

Costs and incurrent and advanced

<u>Date</u>	<u>Description</u>	<u>Amount</u>
	Pacer - Online Research	55.20
Total Costs incurrent and advanced		\$55.20
Current Fees and Costs		\$6,673.70

Genovese Joblove & Battista, P.A.

100 Southeast Second Street, 44th Floor
Miami, Florida 33131
Telephone (305) 349-2300 Facsimile (305) 349-2310
Employer ID# 65-0518134

PROMESA - Official Committee of Unsecured Creditors

August 4, 2020
Please Refer to
Invoice Number: 98603

Attn:

GJB Tax ID No. 65-0518134

Re: PROMESA: Official Committee of Unsecured Creditors / ERS Litigation - Employees Retirement System of the
~~Government - Commonwealth of Puerto Rico~~

SUMMARY / REMITTANCE COPY

Client/Matter # 12272-003

PROMESA - Official Committee of Unsecured Creditors

PROMESA: Official Committee of Unsecured Creditors / ERS Litigation - Employees Retirement System of the Government
Commonwealth of Puerto Rico

(Services rendered outside of Puerto Rico)

For fees for professional services
for the period ending Jun 30, 2020

5,862.50

Costs incurred and advanced

Current Fees and Costs Due

5,862.50

We encourage our clients to pay via ACH, however, in the event that you pay by check, please send payment to the remittance address below:

TO PROTECT AGAINST FRAUD, the Firm will not change its wiring instructions via email. We strongly encourage clients to confirm any change in wiring instructions by contacting Ken Forrest @ 305-349-2312 or via email @ kforrest@gjb-law.com and requesting written and verbal confirmation.

Wiring and ACH Instructions:

Bank Name: Biscayne Bank
Bank Telephone: 305-447-5050
Account Name: Genovese Joblove & Battista, P.A. - Operating
Routing Number : 066015767
Account Number : 21007711

Remittance Address:

Genovese Joblove & Battista, P.A.
100 Southeast Second Street, 44th Floor
Miami, Florida 33131

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Genovese Joblove & Battista, P.A.

100 Southeast Second Street, 44th Floor
Miami, Florida 33131
Telephone (305) 349-2300 Facsimile (305) 349-2310
Employer ID# 65-0518134

PROMESA - Official Committee of Unsecured Creditors

August 4, 2020
Please Refer to
Invoice Number: 98603

Attn:

GJB Tax ID No. 65-0518134

Re: PROMESA: Official Committee of Unsecured Creditors / ERS Litigation - Employees Retirement System of the
~~Government Commonwealth of Puerto Rico~~

FOR PROFESSIONAL SERVICES RENDERED
for the period ending Jun 30, 2020

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
B190 / Other Contested Matters					
06/11/20	JMS	Attention to amended complaint in Northern Trust action.	0.60	500.00	300.00
Subtotal: B190 / Other Contested Matters			0.60		\$300.00
B191 / General Litigation					
06/03/20	JA	Confer with opposing counsel regarding dismissal of certain parties base on agreed-upon thresholds (.1); strategize regarding dismissal (.1)	0.20	575.00	115.00
06/11/20	JA	Receive and review AP 3566, ECF 917 Motion for Judgment on the Pleadings for Conflict Issues.	0.30	575.00	172.50
06/12/20	JHG	Review and analysis of ECF 13414, ERS regarding 2004 discovery.	0.60	765.00	459.00
06/17/20	JA	Review Amended Complaint in AP 355 to correct defendants (.2); review motion regarding discovery and briefing schedule AP 356 (.1)	0.30	575.00	172.50
06/17/20	AMC	Review and revise amended complaint and review of corresponding exhibits.	1.40	375.00	525.00
06/17/20	JZ	Redact over 700 pages of exhibits to be attached to Amended Complaint (1.2); revise Amended Complaint per A. Castaldi's instructions (.8); draft appendix to Amended Complaint (.6); draft Adversary Cover Sheet (.4); draft proposed summonses (.4); e-mail proposed filing to A. Castaldi for review (.1)	3.50	195.00	682.50
06/18/20	JA	Review Informative Motion ECF 922.	0.10	575.00	57.50
06/18/20	JMS	Attention to litigaiton schedule and [REDACTED]	1.40	500.00	700.00

PROMESA - Official Committee of Unsecured Creditors
12272-003
Invoice No. 98603

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06/18/20	AMC	Finalized draft amended complaint for circulation to SCC counsel and local counsel.	0.60	375.00	225.00
06/18/20	JZ	Receipt and review of Joint Informative Motion advising the Court of the status of the status of the discovery dispute and briefing schedule with respect to certain issues raised in certain contested matters and Adversary Proceedings related to the Bonds issued by the ERS filed in ADV. 19-356, 19-357-, 19-359, 19-361 and 19-367 (.4); update each electronic case profile (.2)	0.60	195.00	117.00
06/21/20	JA	Review proposed Amended Complaint for AP 355.	0.30	575.00	172.50
06/22/20	JA	Strategize with A. Castaldi regarding modification to proposed Amended Complaint in AP 355 (.2); review Urgent Motion ERS 103 in AP 356 (.1); review Urgent Joint Motion in108 in AP 357 (.1); review ERS AP 359 ECF 87 (.1); review AP 361 ECF 90 (.1); review ECF 93 in AP 367 (.1)	0.70	575.00	402.50
06/23/20	JHG	Review ECF (13474) and related filings, joint urgent motion and order.	0.90	765.00	688.50
06/23/20	JZ	Receipt and review of Joint Urgent Motion modify the briefing and discovery deadlines filed in ADV 19-356, 19-357, 19-359, 19-361 and 19-367; circulate same; update each electronic case profile.	0.60	195.00	117.00
06/24/20	JMS	Review issues concerning ERS deadlines and scheduling issues as it relates to litigation where GJB is of counsel.	1.60	500.00	800.00
06/24/20	JZ	Receipt and review of Order Granting Joint Urgent Motion modify the briefing and discovery deadlines filed in ADV 19-356, 19-357, 19-359, 19-361 and 19-367; circulate same; calendar deadlines; update each electronic case profile.	0.80	195.00	156.00
Subtotal: B191 / General Litigation			13.90		\$5,562.50
Total			14.50		\$5,862.50

Timekeeper Summary

<u>ID</u>	<u>Timekeeper Name</u>	<u>Title</u>	<u>BillHours</u>	<u>BillRate</u>	<u>BillAmount</u>
JHG	John H Genovese	Sr. Partner	1.50	765.00	1,147.50
JMS	Jesus M Suarez	Partner	3.60	500.00	1,800.00
JA	John Arrastia	Partner	1.90	575.00	1,092.50
AMC	Angelo M Castaldi	Associate	2.00	375.00	750.00
JZ	Johana Zamora	Paralegal	5.50	195.00	1,072.50
Total			14.50		\$5,862.50

Current Fees and Costs

\$5,862.50

Genovese Joblove & Battista, P.A.

100 Southeast Second Street, 44th Floor
Miami, Florida 33131
Telephone (305) 349-2300 Facsimile (305) 349-2310
Employer ID# 65-0518134

PROMESA - Official Committee of Unsecured Creditors

August 4, 2020
Please Refer to
Invoice Number: 98604

Attn:

GJB Tax ID No. 65-0518134

Re: PROMESA: Official Committee of Unsecured Creditors / HTA Litigation - Puerto Rico Highways & Transportation Authority

SUMMARY / REMITTANCE COPY

Client/Matter # 12272-004

PROMESA - Official Committee of Unsecured Creditors

PROMESA: Official Committee of Unsecured Creditors / HTA Litigation - Puerto Rico Highways & Transportation Authority

(Services rendered outside of Puerto Rico)

For fees for professional services for the period ending Jun 30, 2020	58.50
Costs incurred and advanced	
Current Fees and Costs Due	58.50

We encourage our clients to pay via ACH, however, in the event that you pay by check, please send payment to the remittance address below:

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Wiring and ACH Instructions:

Bank Name: Biscayne Bank
Bank Telephone: 305-447-5050
Account Name: Genovese Joblove & Battista, P.A. - Operating
Routing Number : 066015767
Account Number : 21007711

Remittance Address:

Genovese Joblove & Battista, P.A.
100 Southeast Second Street, 44th Floor
Miami, Florida 33131

For payment, please reference the invoice, client and matter number(s) being paid.
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Genovese Joblove & Battista, P.A.

100 Southeast Second Street, 44th Floor
Miami, Florida 33131
Telephone (305) 349-2300 Facsimile (305) 349-2310
Employer ID# 65-0518134

PROMESA - Official Committee of Unsecured Creditors

August 4, 2020
Please Refer to
Invoice Number: 98604

Attn:

GJB Tax ID No. 65-0518134

Re: PROMESA: Official Committee of Unsecured Creditors / HTA Litigation - Puerto Rico Highways & Transportation
Authority

FOR PROFESSIONAL SERVICES RENDERED
for the period ending Jun 30, 2020

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
B191 / General Litigation					
06/04/20	JZ	Receipt and review of Minute Entry for proceedings relating to the Lift of Stay Motions [ECF No. 836]; calendar deadline to file status report; circulate same; update electronic case profile.	0.30	195.00	58.50
Subtotal: B191 / General Litigation			0.30		\$58.50
Total			0.30		\$58.50

Timekeeper Summary

<u>ID</u>	<u>Timekeeper Name</u>	<u>Title</u>	<u>BillHours</u>	<u>BillRate</u>	<u>BillAmount</u>
JZ	Johana Zamora	Paralegal	0.30	195.00	58.50
Total			0.30		\$58.50

Current Fees and Costs

\$58.50

Genovese Joblove & Battista, P.A.

100 Southeast Second Street, 44th Floor
Miami, Florida 33131
Telephone (305) 349-2300 Facsimile (305) 349-2310
Employer ID# 65-0518134

PROMESA - Official Committee of Unsecured Creditors

September 10, 2020
Please Refer to
Invoice Number: 98924

Attn:

GJB Tax ID No. 65-0518134

Re: PROMESA: Official Committee of Unsecured Creditors / Special Conflict Counsel

SUMMARY / REMITTANCE COPY

Client/Matter # 12272-001
PROMESA - Official Committee of Unsecured Creditors
PROMESA: Official Committee of Unsecured Creditors / Special Conflict Counsel

(Services rendered outside of Puerto Rico)

For fees for professional services for the period ending Jul 31, 2020	92,304.50
Costs incurred and advanced	<u>7,384.90</u>
Current Fees and Costs Due	99,689.40

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100 Southeast Second Street, 44th Floor
Miami, Florida 33131

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Genovese Joblove & Battista, P.A.

100 Southeast Second Street, 44th Floor
Miami, Florida 33131
Telephone (305) 349-2300 Facsimile (305) 349-2310
Employer ID# 65-0518134

PROMESA - Official Committee of Unsecured Creditors

September 10, 2020

Please Refer to

Invoice Number: 98924

Attn:

GJB Tax ID No. 65-0518134

Re: PROMESA: Official Committee of Unsecured Creditors / Special Conflict Counsel

FOR PROFESSIONAL SERVICES RENDERED
for the period ending Jul 31, 2020

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
B110 / Case Administration					
07/01/20	JAD	Review and analyze all court filings in Main Case, Title III cases, and adversary proceedings for June 30, 2020 and July 1, 2020 in order to prepare digest of matters relevant to special litigation counsel, prepare digest of filings, direct paraprofessionals to calendar appropriate deadlines, and circulate summary.	3.20	315.00	1,008.00
07/01/20	JZ	Review of memo circulated by J. Delgado.	0.50	195.00	97.50
07/01/20	JZ	Conference with J. Delgado and V. Lamdin regarding recent filings, calendaring and weekly meetings.	0.70	195.00	136.50
07/02/20	JAD	Review and analyze all court filings in Main Case, Title III cases, and adversary proceedings for July 2, 2020 in order to prepare digest of matters relevant to special litigation counsel, prepare digest of filings, direct paraprofessionals to calendar appropriate deadlines, and circulate summary.	2.90	315.00	913.50
07/02/20	JZ	Commence updating PROMESA excel chart of pending matters and deadlines.	1.10	195.00	214.50
07/02/20	JZ	Review of memo circulated by J. Delgado.	0.40	195.00	78.00
07/03/20	JAD	Review and analyze all court filings in Main Case, Title III cases, and adversary proceedings for July 3, 2020 in order to prepare digest of matters relevant to special litigation counsel, prepare digest of filings, direct paraprofessionals to calendar appropriate deadlines, and circulate summary.	2.60	315.00	819.00
07/03/20	JZ	Review of memo circulated by J. Delgado.	0.30	195.00	58.50

PROMESA - Official Committee of Unsecured Creditors
12272-001
Invoice No. 98924

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07/06/20	JAD	Review and analyze all court filings in Main Case, Title III cases, and adversary proceedings for July 3, 2020 through July 5, 2020 in order to prepare digest of matters relevant to special litigation counsel, prepare digest of filings, direct paraprofessionals to calendar appropriate deadlines, and circulate summary. (.9)	1.80	315.00	567.00
		Review and analyze all court filings in Main Case, Title III cases, and adversary proceedings for July 6, 2020 in order to prepare digest of matters relevant to special litigation counsel, prepare digest of filings, direct paraprofessionals to calendar appropriate deadlines, and circulate summary. (.9)			
07/06/20	JZ	Review of daily summary prepared by J. Delgado.	0.30	195.00	58.50
07/07/20	JAD	Review and analyze all court filings in Main Case, Title III cases, and adversary proceedings for July 7, 2020 in order to prepare digest of matters relevant to special litigation counsel, prepare digest of filings, direct paraprofessionals to calendar appropriate deadlines, and circulate summary.	2.40	315.00	756.00
07/07/20	JZ	Review of daily summary prepared by J. Delgado.	0.40	195.00	78.00
07/08/20	JAD	Review and analyze all court filings in Main Case, Title III cases, and adversary proceedings for July 8, 2020 in order to prepare digest of matters relevant to special litigation counsel, prepare digest of filings, direct paraprofessionals to calendar appropriate deadlines, and circulate summary. (1.7)	1.70	315.00	535.50
07/08/20	JZ	Review of daily summary prepared by J. Delgado.	0.40	195.00	78.00
07/09/20	JAD	Review and analyze all court filings in Main Case, Title III cases, and adversary proceedings for July 9, 2020 in order to prepare digest of matters relevant to special litigation counsel, prepare digest of filings, direct paraprofessionals to calendar appropriate deadlines, and circulate summary (2.3)	2.30	315.00	724.50
07/09/20	JZ	Conference with J. Delgado regarding recent filing and updates on chart.	0.40	195.00	78.00
07/09/20	JZ	Review of daily summary prepared by J. Delgado.	0.40	195.00	78.00
07/10/20	JAD	Review and analyze all court filings in Main Case, Title III cases, and adversary proceedings for July 10, 2020 in order to prepare digest of matters relevant to special litigation counsel, prepare digest of filings, direct paraprofessionals to calendar appropriate deadlines, and circulate summary. (1.8)	1.80	315.00	567.00
07/10/20	JZ	Review of daily summary prepared by J. Delgado.	0.30	195.00	58.50

PROMESA - Official Committee of Unsecured Creditors
12272-001
Invoice No. 98924

Page 3

07/13/20	JAD	Review and analyze all court filings in Main Case, Title III cases, and adversary proceedings for July 10, 2020 through July 12, 2020 in order to prepare digest of matters relevant to special litigation counsel, prepare digest of filings, direct paraprofessionals to calendar appropriate deadlines, and circulate summary (.4)	1.60	315.00	504.00
		Review and analyze all court filings in Main Case, Title III cases, and adversary proceedings for July 13, 2020 in order to prepare digest of matters relevant to special litigation counsel, prepare digest of filings, direct paraprofessionals to calendar appropriate deadlines, and circulate summary. (1.2)			
07/13/20	JZ	Review of daily summary prepared by J. Delgado.	0.50	195.00	97.50
07/14/20	JZ	Review of daily summary prepared by J. Delgado.	0.40	195.00	78.00
07/15/20	JAD	Review and analyze all court filings in Main Case, Title III cases, and adversary proceedings for July 14 and July 15, 2020 in order to prepare digest of matters relevant to special litigation counsel, prepare digest of filings, direct paraprofessionals to calendar appropriate deadlines, and circulate summary	1.40	315.00	441.00
07/16/20	JAD	Review and analyze all court filings in Main Case, Title III cases, and adversary proceedings for July 16 in order to prepare digest of matters relevant to special litigation counsel, prepare digest of filings, direct paraprofessionals to calendar appropriate deadlines, and circulate summary	1.30	315.00	409.50
07/17/20	JAD	Review and analyze all court filings in Main Case, Title III cases, and adversary proceedings for July 16 and July 17 in order to prepare digest of matters relevant to special litigation counsel, prepare digest of filings, direct paraprofessionals to calendar appropriate deadlines, and circulate summary	2.70	315.00	850.50
07/17/20	JZ	Receipt and review of Notice of Adjournment of Omnibus Objections Scheduled for Hearing at the July 29, 2020 Omnibus Hearing to the September 16, 2020 Hearing [ECF No. 13702]; circulate same; update electronic case profile.	0.30	195.00	58.50
07/17/20	JZ	Review of daily summary prepared by J. Delgado.	0.60	195.00	117.00
07/19/20	JAD	Review and analyze all court filings in Main Case, Title III cases, and adversary proceedings for July 17 through July 19 in order to prepare digest of matters relevant to special litigation counsel, prepare digest of filings, direct paraprofessionals to calendar appropriate deadlines, and circulate summary.	1.20	315.00	378.00
07/20/20	JAD	Review and analyze all court filings in Main Case, Title III cases, and adversary proceedings for July 20 in order to prepare digest of matters relevant to special litigation counsel, prepare digest of filings, direct paraprofessionals to calendar appropriate deadlines, and circulate summary	1.30	315.00	409.50

PROMESA - Official Committee of Unsecured Creditors
12272-001
Invoice No. 98924

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07/20/20	JZ	Review of daily summary prepared by J. Delgado.	0.50	195.00	97.50
07/21/20	JAD	Review and analyze all court filings in Main Case, Title III cases, and adversary proceedings for July 21 in order to prepare digest of matters relevant to special litigation counsel, prepare digest of filings, direct paraprofessionals to calendar appropriate deadlines, and circulate summary.	1.10	315.00	346.50
07/21/20	JZ	Review of daily summary prepared by J. Delgado.	0.40	195.00	78.00
07/22/20	JAD	Review and analyze all court filings in Main Case, Title III cases, and adversary proceedings for July 22 in order to prepare digest of matters relevant to special litigation counsel, prepare digest of filings, direct paraprofessionals to calendar appropriate deadlines, and circulate summary. (2.4).	2.40	315.00	756.00
07/22/20	JZ	Receipt and review of Court's Order Regarding Procedures for July 29-30, 2020 Omnibus Hearing [ECF No. 13746]; calendar deadlines contained in order; update electronic case profile.	0.40	195.00	78.00
07/22/20	JZ	Review of daily summary prepared by J. Delgado.	0.30	195.00	58.50
07/22/20	JZ	E-mails to and from J. Arrastia and J. Delgado regarding the July 29th hearings and which hearings we should have an interest in; review of internal calendar; retrieve Judge's calendar; e-mail findings.	0.30	195.00	58.50
07/23/20	JAD	Review and analyze all court filings in Main Case, Title III cases, and adversary proceedings for July 23 in order to prepare digest of matters relevant to special litigation counsel, prepare digest of filings, direct paraprofessionals to calendar appropriate deadlines, and circulate summary. (1.7).	1.70	315.00	535.50
07/23/20	JZ	Review of daily summary prepared by J. Delgado.	0.40	195.00	78.00
07/24/20	JAD	Review and analyze all court filings in Main Case, Title III cases, and adversary proceedings for July 24, 2020 in order to prepare digest of matters relevant to special litigation counsel, prepare digest of filings, direct paraprofessionals to calendar appropriate deadlines, and circulate summary.	0.50	315.00	157.50
07/24/20	JZ	Review of daily summary prepared by J. Delgado.	0.30	195.00	58.50
07/27/20	JAD	Review and analyze all court filings in Main Case, Title III cases, and adversary proceedings for July 24 through July 27, 2020 in order to prepare digest of matters relevant to special litigation counsel, prepare digest of filings, direct paraprofessionals to calendar appropriate deadlines, and circulate summary regarding same.	0.70	315.00	220.50
07/27/20	JZ	Review of daily summary prepared by J. Delgado.	0.30	195.00	58.50

PROMESA - Official Committee of Unsecured Creditors
12272-001
Invoice No. 98924

Page 5

07/28/20	JAD	Review and analyze all court filings in Main Case, Title III cases, and adversary proceedings for July 28, 2020 in order to prepare digest of matters relevant to special litigation counsel, prepare digest of filings, direct paraprofessionals to calendar appropriate deadlines, and circulate summary.	1.40	315.00	441.00
07/28/20	JZ	Review of daily summary prepared by J. Delgado.	0.40	195.00	78.00
07/29/20	JAD	Review and analyze all court filings in Main Case, Title III cases, and adversary proceedings for July 29, 2020 in order to prepare digest of matters relevant to special litigation counsel, prepare digest of filings, direct paraprofessionals to calendar appropriate deadlines, and circulate summary.	0.90	315.00	283.50
07/29/20	JZ	Review of daily summary prepared by J. Delgado.	0.30	195.00	58.50
07/30/20	JAD	Review and analyze all court filings in Main Case, Title III cases, and adversary proceedings for July 30, 2020 in order to prepare digest of matters relevant to special litigation counsel, prepare digest of filings, direct paraprofessionals to calendar appropriate deadlines, and circulate summary.	0.60	315.00	189.00
07/30/20	JZ	Review of daily summary prepared by J. Delgado.	0.40	195.00	78.00
07/31/20	JAD	Review and analyze all court filings in Main Case, Title III cases, and adversary proceedings for July 31, 2020 in order to prepare digest of matters relevant to special litigation counsel, prepare digest of filings, direct paraprofessionals to calendar appropriate deadlines, and circulate summary.	2.30	315.00	724.50
07/31/20	JZ	Review of daily summary prepared by J. Delgado.	0.40	195.00	78.00
Subtotal: B110 / Case Administration			51.20		\$14,760.00
B113 / Pleadings Review					
07/08/20	CBH	Receipt and review of e-mail correspondence regarding calendaring rejection motion and response deadlines.	0.30	195.00	58.50
Subtotal: B113 / Pleadings Review			0.30		\$58.50
B150 / Meetings of Creditors					
07/08/20	JA	Participate in weekly Committee call regarding status of various issues and strategy.	0.60	575.00	345.00
07/10/20	JA	Email to Committee regarding fee statements and comparison to budget	0.20	575.00	115.00
07/11/20	JA	Prepare correspondence to Committee regarding case issues and litigation strategy concerning Fuel Oil litigation	0.40	575.00	230.00
07/29/20	JA	Attend litigation strategy call with committee relating to issues at Omnibus and impact on Committee litigation (.5); Confer with chair (.1)	0.60	575.00	345.00

PROMESA - Official Committee of Unsecured Creditors
12272-001
Invoice No. 98924

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Subtotal: B150 / Meetings of Creditors			1.80		\$1,035.00
B155 / Court Hearings					
07/15/20	JA	Confer with Committee regarding pending litigation items and anticipated issues (.2) Present at Committee call regarding preliminary observations regarding 2019 disclosures (.5)	0.70	575.00	402.50
07/29/20	JA	Attend Omnibus Hearing as to issues that could impact matters relating to GJB role as special litigation counsel	1.90	575.00	1,092.50
Subtotal: B155 / Court Hearings			2.60		\$1,495.00
B160 / Fee/Employment Applications					
07/01/20	CBH	Begin preparation of fourth interim fee application; review of upcoming deadline and dates included in fee app.	1.00	195.00	195.00
07/02/20	CBH	Continue preparation of fourth interim fee application; review of February invoice; update application; review of monthly budgets; organization.	1.00	195.00	195.00
07/02/20	CE	Prepare the February Monthly Fee Objection Statement; E-mail correspondence with M. Guitian.	0.50	150.00	75.00
07/06/20	MGG	Emails to and from C. Hopkins re: Interim Fee Application and John Arrastia (.30).	0.30	575.00	172.50
07/06/20	CE	Finalize and serve GJB Monthly Fee Objection Statement for February 2020.	0.50	150.00	75.00
07/06/20	CBH	Continue preparation of fourth interim fee application; meeting with M. Guitian regarding finalization of invoices and upcoming deadline.	1.00	195.00	195.00
07/07/20	CBH	Continue preparation of fourth interim fee application; preparation of exhibits; review of budgets and bill and payment report.	1.50	195.00	292.50
07/09/20	MGG	Email to and from C. Hopkins re: Fourth Interim Fee Application. Emails to and from John Arrastia re: same.	0.50	575.00	287.50
07/09/20	CBH	E-mail correspondence with M. Guitian and J. Arrastia regarding 4th interim fee application and invoices for application period; review of application regarding examiner language.	0.70	195.00	136.50
07/11/20	JA	Email from and to Fee Examiner counsel regarding pending issues concerning scope of work and agreement on proposed reductions	0.60	575.00	345.00
07/14/20	JA	Confer with committee chair regarding litigation strategy	0.20	575.00	115.00
07/14/20	MGG	Email to and from John Arrastia re: February Statement and tax withholding.	0.30	575.00	172.50
07/22/20	JA	Coordinate redaction of three months of fee statements for submissions	0.20	575.00	115.00

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07/22/20	JAD	Conference with J. Arrastia regarding redaction of confidential work product on fee statements (.2).	0.20	315.00	63.00
07/23/20	MGG	Email to and from John Arrastia and Ken Forrest re: redactions and preparation of LEDES files.	0.30	575.00	172.50
07/23/20	JA	Redact several sets of fee invoices (March-May) in all matters for submission (.4)	0.40	575.00	230.00
07/23/20	JAD	Preparation of keyword list for further redaction of fees to protect confidential work product (.3)	0.30	315.00	94.50
07/23/20	JZ	Receipt and review of Fee Examiner's Report on Uncontested Professional Fee Matters for Consideration in Connection with the July 29, 2020 Omnibus Hearing which includes our Fee Application [ECF No. 13810]; update electronic case profile.	0.30	195.00	58.50
07/27/20	MGG	Telephone conference with Valerie Soler re: Payment of GJB Invoices and withholding.	0.40	575.00	230.00
Subtotal: B160 / Fee/Employment Applications			10.20		\$3,220.00
B161 / Budgeting					
07/08/20	JA	Finalize May fee statements.	0.60	575.00	345.00
07/13/20	JA	Prepare draft August budget.	0.70	575.00	402.50
Subtotal: B161 / Budgeting			1.30		\$747.50
B191 / General Litigation					
07/01/20	JHG	Review (ECF 13512-1), amended case management and administrative procedures.	0.80	765.00	612.00
07/01/20	JHG	Review email from Alex Bongartz and analysis of ERS Ultra vires issues.	0.70	765.00	535.50
07/02/20	JHG	Review email from Alex Bongartz analyzing HTA and Prepa lift stay orders.	0.70	765.00	535.50
07/02/20	JHG	Review and analysis of ECF 13541, opinion and order.	1.10	765.00	841.50
07/02/20	AMC	Review of Court's Opinion and Order in Connection With Preliminary Hearing Regarding Motion Concerning Application of the Automatic Stay to the Revenues Securing the CCDA Bonds.	0.40	375.00	150.00
07/02/20	AMC	Review / analyze Court's Order Further Amending Case Management Procedures.	0.20	375.00	75.00
07/02/20	JZ	Receipt and review of Court's Opinion and Order in Connection With Preliminary Hearing Regarding Motion Concerning Application of the Automatic Stay to the Revenues Securing the CCDA Bonds [ECF 13540]; calendar deadline to meet and confer; update electronic case profile.	0.30	195.00	58.50

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07/02/20	JZ	Receipt and review of Court's Opinion and Order in Connection With Preliminary Hearing Regarding Regarding Amended Motion of Ambac Assurance Corp., et al. Concerning Application of the Automatic Stay to the Revenues Securing PRIFA Rum Tax Bonds [ECF 13541]; calendar deadline to meet and confer; update electronic case profile.	0.30	195.00	58.50
07/06/20	JHG	Review daily summary prepared by J. Delgado to identify and analyze strategic litigation issues.	0.40	765.00	306.00
07/06/20	JHG	Review and analysis of ECF 13552, seventh supplemental verified statement and Exhibits A-F of Ad Hoc Group.	1.10	765.00	841.50
07/06/20	JHG	Review and analysis of ECF 13553, Ad Hoc Group disclosures and Exhibits A-D.	0.80	765.00	612.00
07/06/20	JHG	Review ECF 13554, Constitutional Debt Coalition seventh supplemental verified statement and Exhibit "A".	0.70	765.00	535.50
07/06/20	JHG	Review ECF 13555, seventh supplemental statement of bondholders and Exhibit A.	0.80	765.00	612.00
07/06/20	JHG	Review ECF twelfth supplemental verified statement of Prepa Ad Hoc Bondholders, Exhibits A & B.	0.90	765.00	688.50
07/06/20	JA	Initial overview of Rule 2019 Disclosures by new PSA Bondholders to [REDACTED].	1.20	575.00	690.00
07/07/20	JHG	Review email from Alex Bongartz regarding update and litigation strategy and issues regarding [REDACTED].	0.80	765.00	612.00
07/07/20	JHG	Review daily summary prepared by J. Delgado to identify and analyze strategic litigation issues.	0.70	765.00	535.50
07/07/20	JHG	Review and analyze (ECF 13573) Ambac Assurance motion to strike amended plan support agreement.	1.20	765.00	918.00
07/07/20	JA	Review Rule 2019 Disclosures and [REDACTED].	0.40	575.00	230.00
07/07/20	JZ	Receipt and review of Ambac Assurance Corporation's Motion to Strike Certain Provisions of the Amended Plan Support Agreement By and Among the Financial Oversight and Management Board for Puerto Rico, Certain GO Holders, and Certain PBA Holders [ECF No. 13573]; circulate same; update electronic case profile.	0.30	195.00	58.50
07/08/20	JHG	Review email from Alex Bongartz regarding Prepa motion for administrative expenses, Ambac motion regarding PSA.	1.10	765.00	841.50

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07/08/20	JA	Review and analyze [REDACTED] and strategize regarding creation of database to extract meaningful information (1.3); structure and create template of database and methodology to [REDACTED] non-public information (1.6); confer and strategize with staff and associates to research and populate database (.9); confer and strategize with Committee Chair regarding [REDACTED] (.3)	4.10	575.00	2,357.50
07/08/20	AMC	Attend to analysis of amended plan provisions governing / applying to [REDACTED], and corresponding information available [REDACTED]	1.60	375.00	600.00
07/08/20	AMC	Attend Zoom conference internally to discuss analysis of [REDACTED] and, thereafter attend to in-person meeting with J. Arrastia to discuss the same.	0.90	375.00	337.50
07/08/20	AMC	Analyze template spreadsheet governing [REDACTED], and communication internally concerning the same.	0.30	375.00	112.50
07/08/20	JAD	Conference with J. Arrastia and A. Castaldi regarding [REDACTED] (.3) Initial preparation of [REDACTED] (.3).	0.60	315.00	189.00
07/09/20	JHG	Review daily summary from J. Delgado to identify and analyze strategic litigation issues.	0.90	765.00	688.50
07/09/20	JHG	Review (ECF 13595), opposition to judgment on its pleadings regarding recourse claims.	1.10	765.00	841.50
07/09/20	JHG	Review ECF 13592, limited joinder of committee in opposition to motion for judgment on the pleadings.	0.40	765.00	306.00
07/09/20	JHG	Review and analysis of joint status report (ECF 13601) regarding bond stay relief motion.	0.80	765.00	612.00
07/09/20	JHG	Review and analysis of litigation issues raised in ECF 30 in 19-00355, adversary proceeding regarding 3 billions in bonds.	2.30	765.00	1,759.50
07/09/20	JA	Review and analysis of [REDACTED] as to changes in [REDACTED], based on [REDACTED]	2.90	575.00	1,667.50
07/09/20	JAD	Conference with J. Zamora to discuss pace and strategy concerning daily filing memorandums. (.4) Conference with H. Gray to discuss issues concerning bond-trading spreadsheets. (.6) Continued preparation of bond-trading spreadsheet (.8).	1.80	315.00	567.00
07/09/20	AMC	Attend to review / analysis of [REDACTED] of the [REDACTED].	0.60	375.00	225.00

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07/09/20	JZ	Receipt and review of Order Scheduling Briefing of Ambac Assurance Corporation's Motion to Strike Certain Provisions of the Amended Plan Support Agreement [ECF No. 13595]; calendar deadlines contained in order; circulate same; update electronic case profile.	0.30	195.00	58.50
07/09/20	JZ	Receipt and review of Joint Status Report With Respect to Further Proceedings Regarding the Revenue Bond Stay Relief Motions [ECF No. 13601]; circulate same; update electronic case profile.	0.30	195.00	58.50
07/10/20	JA	Continued review and analysis of [REDACTED] [REDACTED]	2.10	575.00	1,207.50
07/10/20	JMS	Review issues concerning settlement between FOMB and [REDACTED]	1.30	500.00	650.00
07/10/20	JAD	Continued preparation of [REDACTED] spreadsheet detailing activity of [REDACTED].	0.60	315.00	189.00
07/11/20	JAD	Continued preparation of [REDACTED] regarding activity during [REDACTED].	2.20	315.00	693.00
07/13/20	JHG	Review email from Alex Bongartz regarding Monolines litigation.	0.80	765.00	612.00
07/13/20	JHG	Review (ECF 13602) emergency motion regarding Fuel Line lenders.	0.50	765.00	382.50
07/13/20	JHG	Review and analysis of (ECF 13601) joint status report.	1.10	765.00	841.50
07/13/20	JHG	Review (ECF 13602) UCC motion to adjourn.	0.60	765.00	459.00
07/13/20	JA	Review and analyze [REDACTED] [REDACTED] and create spreadsheets, charts and examinations to patterns [REDACTED] [REDACTED]	2.80	575.00	1,610.00
07/13/20	JZ	Receipt and review of Joint Urgent Motion of Ambac Assurance Corp. and the FOMB for an Adjournment of Ambac's Motion to Strike Certain Provisions of the Amended PSA [ECF No. 13620]; circulate same; update electronic case profile.	0.30	195.00	58.50
07/14/20	JHG	Review and analysis of [REDACTED].	1.30	765.00	994.50
07/14/20	JA	Correlate and analyze data relating to [REDACTED] [REDACTED] analytical email memorandum (2.3); Review proposed motion to extend vendor deadlines from SCC (.1)	2.40	575.00	1,380.00
07/14/20	JZ	Receipt and review of Order Granting Joint Urgent Motion of Ambac Assurance Corp. and the FOMB for an Adjournment of Ambac's Motion to Strike Certain Provisions of the Amended PSA [ECF No. 13626]; calendar deadlines; circulate same; update electronic case profile.	0.30	195.00	58.50

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07/15/20	JHG	Review email from Alex Bongartz and Prepa analysis.	1.20	765.00	918.00
07/15/20	JA	Email correspondence with opposing counsel regardg [REDACTED] Settlement	0.20	575.00	115.00
07/15/20	JMS	Review issues concerning renewed FOMB proposal to settle [REDACTED].	2.10	500.00	1,050.00
07/15/20	AMC	Continued detailed review and analysis of [REDACTED] [REDACTED] continued review and research of [REDACTED] in conjunction therewith	1.60	375.00	600.00
07/16/20	JHG	Review daily summary prepared by J. Delgado to identify strategic litigation issues.	0.50	765.00	382.50
07/16/20	JHG	Review (ECF 13612), order scheduling briefing.	0.20	765.00	153.00
07/16/20	JHG	Review (ECF 13616), UCC reply regarding administrative expense claim.	0.50	765.00	382.50
07/16/20	JA	Review draft motion to Modify Stay Order as it relates to issues pertaining to special litigation counsel	0.60	575.00	345.00
07/17/20	JZ	Receipt and review of PREPA's Amended Notice of Omnibus Motion for Entry of an Order (A) Authorizing PREPA to Reject Certain Power Purchase and Operating Agreements, and (B) Granting Related Relief; calendar new deadlines and hearing date; circulate same; update electronic case profile.	0.40	195.00	78.00
07/20/20	JHG	Review email summary from J. Delgado to identify and analyze strategic litigation issues.	0.60	765.00	459.00
07/20/20	JHG	Review (ECF 13724), order on urgent motion regarding scheduling and appointments.	0.30	765.00	229.50
07/20/20	JHG	Review and analysis of (ECF 13726), UCC urgent motion of UCC to lift stay regarding collection period.	1.80	765.00	1,377.00
07/20/20	JHG	Review (ECF 13727), urgent motion of UCC and proposed order.	0.60	765.00	459.00
07/20/20	JHG	Continued review of issues regarding [REDACTED].	0.90	765.00	688.50
07/20/20	JA	Review and analysis of numerous [REDACTED] [REDACTED] to establish [REDACTED]	2.10	575.00	1,207.50
07/20/20	JA	Review Motion to Modify Stay as to legal issues applicable to litigation.	0.60	575.00	345.00
07/20/20	JMS	Review issues concerning [REDACTED] assertion of litigation claims.	1.80	500.00	900.00

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07/20/20	JZ	Receipt and review of UCC's Urgent Motion of Official Committee of Unsecured Creditors to Lift Stay to Allow Committee to Pursue Objection to GO Priority [ECF No. 13726]; receipt and review of UCC's Urgent Motion to Set Briefing Schedule and Hearing on the Urgent Motion [ECF No. 13727]; circulate same; update electronic case profile.	0.50	195.00	97.50
07/21/20	JHG	Review email from Alex Bongartz regarding Committee litigation.	0.50	765.00	382.50
07/21/20	JHG	Review and analysis of ECF 99, in 20-00005, IRA parties response to FOMB regarding Monolines and excise tax issues.	1.70	765.00	1,300.50
07/21/20	JHG	Review Reorg Media article regarding constitutional referendum.	0.40	765.00	306.00
07/21/20	JHG	Review and analysis of (ECF 80) in Case 20-0003, Ambac opposition to FOMB motion for summary judgment regarding PRIFA.	1.40	765.00	1,071.00
07/21/20	JA	Review and analysis of [REDACTED] relates to [REDACTED]	1.60	575.00	920.00
07/21/20	JMS	Review issues related to [REDACTED] proposed settlement and assertion of claims.	0.80	500.00	400.00
07/21/20	JAD	Continued analysis of [REDACTED]	3.20	315.00	1,008.00
07/21/20	JZ	Receipt and review of the Order (I) Scheduling Briefing of Urgent Motion to Lift Stay, (II) Denying Urgent Motion for Expedited Briefing and Hearing Schedule, and (III) Setting Deadline for Further Status Report Regarding COVID-19 Pandemic and Proposed Disclosure Statement Schedule [ECF 13733]; calendar deadlines and hearing date; circulate same; update electronic case profile.	0.40	195.00	78.00
07/21/20	JZ	Receipt and review of Order Granting Motion for Entry of Ninth Order Extending Time to Assume or Reject Unexpired Leases of Nonresidential Real Property Under Which the Puerto Rico Public Buildings Authority is the Lessor relating to the PBA leases [ECF No. 13738]; calendar deadline; update electronic case profile.	0.30	195.00	58.50
07/21/20	JZ	Receipt and review of Court's Order Scheduling Briefing of Urgent Motion for Entry of an Order Approving Second Amended Stipulation and Consent Order Between Title III Debtors and the PR Fiscal Agency and Financial Advisory Authority Acting on Behalf of the Governmental Entities Listed on Appendix "B" Regarding the Tolling of Statute of Limitation; calendar deadlines [ECF No. 13728]; circulate same; update electronic case profile.	0.30	195.00	58.50
07/22/20	JHG	Review email and (ECF 13765), FOMB opposition to urgent motion for budget order regarding HTA.	1.10	765.00	841.50
07/22/20	JHG	Review email received from Alex Bongartz regarding Committee issues.	0.60	765.00	459.00

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07/22/20	JHG	Review (ECF 13805), reply in support of motion to disallow and dismiss claims.	0.90	765.00	688.50
07/22/20	JHG	Review and analysis of daily memorandum from J. Delgado.	0.40	765.00	306.00
07/22/20	JHG	Review (ECF 13808) Retiree Committee reply of motion to dismiss.	0.90	765.00	688.50
07/22/20	JHG	Review First Circuit decision regarding Section 552 of Bankruptcy Code regarding ERS.	0.80	765.00	612.00
07/22/20	JA	Continued review and analysis of [REDACTED].	2.20	575.00	1,265.00
07/22/20	JA	Analyze issues relating to potential settlement with [REDACTED] of Chapter 5 case claims (.4); Review case file relating to other settlement overtures (.2)	0.60	575.00	345.00
07/22/20	JAD	Continued analysis of [REDACTED] depicting the same. (1.4)	1.40	315.00	441.00
07/23/20	JHG	Review daily summary prepared by J. Delgado to identify and analyze strategic litigation issues.	0.70	765.00	535.50
07/23/20	JHG	Review ECF 13811, UCC limited joinder in support of motion to dismiss and disallow claims and related motion.	0.30	765.00	229.50
07/23/20	JHG	Review of (ECF 13814), reply in further support of urgent motion regarding bridge order.	0.80	765.00	612.00
07/23/20	JA	Confer and strategize with J. Suarez regarding FOMB's proposal for [REDACTED] settlement and attendant issues	0.30	575.00	172.50
07/23/20	JA	Analyze [REDACTED] [REDACTED] relates to [REDACTED] potential claim	2.30	575.00	1,322.50
07/23/20	JMS	Call with SCC counsel re [REDACTED] Settlement (.4), draft e-mail memo re options (.8)	1.20	500.00	600.00
07/23/20	JAD	Redaction of fee statements to protect confidential work product. (2.6)	2.60	315.00	819.00
07/24/20	JHG	Review email from Alex Bongartz regarding Committee litigation and status report.	0.60	765.00	459.00
07/24/20	JHG	Review Monolines reply in support of 926 motion, based on Bongartz analysis regarding statute of limitations.	1.20	765.00	918.00
07/24/20	JA	Confer and strategize with Scott Martinez regarding [REDACTED] [REDACTED] and correlation to Plan classes.	0.40	575.00	230.00
07/26/20	JA	Review case materials and filings relating to Motion to Remand Monoline Complaints against underwriters as it relates to UCC underwriter complaint, including Adversary case in 19-422 and 19-047 (1.6); Motions for Remand (1.1) and oppositions and replies (1.6).	4.30	575.00	2,472.50

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07/27/20	JA	Review congressional testimony relating to Promesa and PREPA (.6); prepare analysis of [REDACTED] relating to potential claims (.8)	1.40	575.00	805.00
07/27/20	JA	Analyze trading history and volume regarding [REDACTED]	1.60	575.00	920.00
07/28/20	JHG	Review email from Alex Bongartz with emphasis on description of ERS litigation and creditor working group suing.	1.80	765.00	1,377.00
07/28/20	JHG	Review daily summary by J. Delgado.	0.40	765.00	306.00
07/28/20	JHG	Review ECF 13838 Underwriters motion.	0.60	765.00	459.00
07/28/20	JHG	Review ECF 138 Monolines limited objection.	0.70	765.00	535.50
07/28/20	JA	Analyze chronology of [REDACTED] identify additional information	1.30	575.00	747.50
07/28/20	JMS	Research prosecution of [REDACTED] under PROMESA, transfer of collateral and definition of [REDACTED] in connection with various issues arising in litigation matters.	2.30	500.00	1,150.00
07/28/20	AMC	Review and analyze AAFAF's Status Report Regarding the Government of Puerto Rico's Activities in Response to the Ongoing COVID-19 Pandemic and FOMB's Status Report in Connection with the July 29-30 Omnibus Hearing.	0.40	375.00	150.00
07/29/20	JMS	Review issues relating to proposed [REDACTED] settlement	1.70	500.00	850.00
07/29/20	JMS	Provide analysis concerning new [REDACTED] Settlement of vendor avoidance claims to J. Arrastia.	1.80	500.00	900.00
07/29/20	JNS	Attention to emails between John Arrastia, Jesus Suarez and JZamora regarding tolling Agreements. Circulate Tolling Agreements tracking chart.	0.20	75.00	15.00
07/30/20	JHG	Review daily summary from J. Delgado to identify and analyze strategic litigation issues.	0.30	765.00	229.50
07/30/20	JHG	Review and analysis of ECF (13904), joint stipulation regarding lift stay.	0.80	765.00	612.00
07/30/20	JA	Continued analysis of [REDACTED]	2.80	575.00	1,610.00
07/31/20	JHG	Review email from Prime Clerk.	0.30	765.00	229.50
07/31/20	JHG	Review (ECF 13929), opposition of FOMB to motion to appoint 926 trustee.	1.10	765.00	841.50
Subtotal: B191 / General Litigation			120.30		\$70,988.50

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Total	187.70	\$92,304.50
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Timekeeper Summary

<u>ID</u>	<u>Timekeeper Name</u>	<u>Title</u>	<u>BillHours</u>	<u>BillRate</u>	<u>BillAmount</u>
JHG	John H Genovese	Sr. Partner	46.50	765.00	35,572.50
JMS	Jesus M Suarez	Partner	13.00	500.00	6,500.00
MGG	Mariaelena Gayo-Guitian	Partner	1.80	575.00	1,035.00
JA	John Arrastia	Partner	45.30	575.00	26,047.50
JAD	Joyce A Delgado	Associate	52.70	315.00	16,600.50
AMC	Angelo M Castaldi	Associate	6.00	375.00	2,250.00
JNS	Jessey N Sardina	Paralegal	0.20	75.00	15.00
CE	Carolyn Esser	Paralegal	1.00	150.00	150.00
CBH	Colleen B Hopkins	Paralegal	5.50	195.00	1,072.50
JZ	Johana Zamora	Paralegal	15.70	195.00	3,061.50
Total			187.70		\$92,304.50

Costs and incurrent and advanced

<u>Date</u>	<u>Description</u>	<u>Amount</u>
07/31/2020	Data management and hosting (12272-001) Trustpoint.One 20-07137	7,384.90

Total Costs incurrent and advanced	\$7,384.90
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Current Fees and Costs	\$99,689.40
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Genovese Joblove & Battista, P.A.

100 Southeast Second Street, 44th Floor
Miami, Florida 33131
Telephone (305) 349-2300 Facsimile (305) 349-2310
Employer ID# 65-0518134

PROMESA - Official Committee of Unsecured Creditors

September 1, 2020
Please Refer to
Invoice Number: 98853

Attn:

GJB Tax ID No. 65-0518134

Re: PROMESA: Official Committee of Unsecured Creditors / PREPA Adversary - Puerto Rico Electric Power Authority

SUMMARY / REMITTANCE COPY

Client/Matter # 12272-002

PROMESA - Official Committee of Unsecured Creditors

PROMESA: Official Committee of Unsecured Creditors / PREPA Adversary - Puerto Rico Electric Power Authority

(Services rendered outside of Puerto Rico)

For fees for professional services
for the period ending Jul 31, 2020

10,571.00

Costs incurred and advanced

Current Fees and Costs Due

10,571.00

We encourage our clients to pay via ACH, however, in the event that you pay by check, please send payment to the remittance address below:

TO PROTECT AGAINST FRAUD, the Firm will not change its wiring instructions via email. We strongly encourage clients to confirm any change in wiring instructions by contacting Ken Forrest @ 305-349-2312 or via email @ kforrest@gjb-law.com and requesting written and verbal confirmation.

Wiring and ACH Instructions:

Bank Name: Biscayne Bank
Bank Telephone: 305-447-5050
Account Name: Genovese Joblove & Battista, P.A. - Operating
Routing Number : 066015767
Account Number : 21007711

Remittance Address:

Genovese Joblove & Battista, P.A.
100 Southeast Second Street, 44th Floor
Miami, Florida 33131

For payment, please reference the invoice, client and matter number(s) being paid.
Please refer all questions to Ken Forrest @ 305-349-2312 or via email @ kforrest@gjb-law.com

Genovese Joblove & Battista, P.A.

100 Southeast Second Street, 44th Floor
Miami, Florida 33131
Telephone (305) 349-2300 Facsimile (305) 349-2310
Employer ID# 65-0518134

PROMESA - Official Committee of Unsecured Creditors

September 1, 2020

Please Refer to

Invoice Number: 98853

Attn:

GJB Tax ID No. 65-0518134

Re: PROMESA: Official Committee of Unsecured Creditors / PREPA Adversary - Puerto Rico Electric Power Authority

FOR PROFESSIONAL SERVICES RENDERED
for the period ending Jul 31, 2020

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
B110 / Case Administration					
07/02/20	MGG	Receive and review Judge Swain's Orders [ECF 13540, 13541, and 13542] on Denial of HTA and PRIFA Lift Stay Motions and CCDA Lift Stay Order and impact on 2019 Motion and other pending litigation.	0.60	575.00	345.00
Subtotal: B110 / Case Administration			0.60		\$345.00
B113 / Pleadings Review					
07/10/20	MGG	Review update from Joyce Delgado on various matters that directly impact GJB's representation concerning PREPA ECF 13602 / 2056: Emergency Motion of the Official Committee of Unsecured Creditors, the Fuel Line Lenders and UTIER to Adjourn Objection Deadline and Hearing Date for LUMA Energy Expense Motion. and the Order Scheduling Briefing Schedule.	0.30	575.00	172.50
Subtotal: B113 / Pleadings Review			0.30		\$172.50
B150 / Meetings of Creditors					
07/08/20	JA	Prepare for and attend conference call with Special Claims Committee of FOMB regarding Joint Status Report.	0.60	575.00	345.00
07/11/20	JA	Review and analyze draft Joint Status Report from Special Claims Committee regarding Fuel Oil litigation	0.30	575.00	172.50
07/22/20	JA	Attend Committee Hearing and advise as to August litigation plan and issues relating to fuel oil litigation.	0.50	575.00	287.50
Subtotal: B150 / Meetings of Creditors			1.40		\$805.00
B161 / Budgeting					
07/07/20	JA	Prepare and finalize March Fee Statements (1.2); prepare and finalize April Fee Statements (1.6); revise May Fee Statements (.8)	3.60	575.00	2,070.00

PROMESA - Official Committee of Unsecured Creditors
12272-002
Invoice No. 98853

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Subtotal: B161 / Budgeting			3.60		\$2,070.00
B191 / General Litigation					
07/01/20	JHG	Review expert report of bond holders.	1.10	765.00	841.50
07/07/20	JMS	Review issues related to Fuel Oil Litigation and upcoming status report, attention to proposed marrero intervention and issues presented by pending [REDACTED].	1.40	500.00	700.00
07/07/20	JA	Review Motion to Reject PPOAs.	0.40	575.00	230.00
07/07/20	JZ	Receipt and review of PREPA's Omnibus Motion for Entry of an Order (A) Authorizing PREPA to Reject Certain Power Purchase and Operating Agreements[ECF No. 2050] (.2); receipt and review of F. Padilla's declaration in support of said motion [ECF No. 2051] (.2); calendar objection deadline and hearing date; circulate filing and update electronic case profile (.2).	0.60	195.00	117.00
07/08/20	MGG	Review ECF 13573, Ambac Assurance Corporation's Motion to Strike Certain Provisions of the Amended Plan Support Agreement By and Among the Financial Oversight and Management Board for Puerto Rico, Certain GO Holders, and Certain PBA Holders and impact on GJB' s role in case.	0.30	575.00	172.50
07/09/20	JMS	Attention to fuel oil status conference and Marrero intervention.	1.50	500.00	750.00
07/10/20	JMS	Attention to status report issues in Fuel Oil case and review proposed Marrero intervention.	1.40	500.00	700.00
07/10/20	JZ	Receipt and review of Emergency Motion of the Official Committee of Unsecured Creditors, the Fuel Line Lenders and UTIER to Adjourn Objection Deadline and Hearing Date for LUMA Energy Expense Motion[ECF No. 2056]; receipt and review of Court's Briefing Order on same [ECF No. 2057]; calendar deadlines contained in order; update electronic case profile.	0.50	195.00	97.50
07/12/20	JA	Research case file regarding challenges to Marerro Plaintiff's intervention and communicate to SCC	0.30	575.00	172.50
07/13/20	JA	Review revised Joint Status Report regarding Fuel Oil Litigation and confer with SCC counsel regarding lifting of stay and renewing litigation (.4); strategize regarding Intervention and issues relating [REDACTED] (.4)	0.80	575.00	460.00

PROMESA - Official Committee of Unsecured Creditors
12272-002
Invoice No. 98853

Page 3

07/13/20	JZ	Receipt and review of Government Parties' Objection to the Emergency Motion of the Official Committee of Unsecured Creditors, the Fuel Line Lenders and UTIER to Adjourn Objection Deadline and Hearing Date for LUMA Energy Administrative Expense Motion [ECF No. 2060]; receipt of UCC's reply in support of their Emergency Motion to adjourn the objection deadline and hearing date for the Motion for Entry of an Order Allowing Administrative Expense Claim for Compensation for Front-End Transition Services Under the Puerto Rico Transmission and Distribution System Operation and Maintenance Agreement with LUMA Energy [ECF No. 2062]; update electronic case profile.	0.40	195.00	78.00
07/14/20	JZ	Receipt and review of Joint Status Report and Proposed Order Modifying Case Management Deadlines in the Fuel Oil ADV case (19-388); circulate same; update electronic case profile.	0.30	195.00	58.50
07/17/20	JA	Review Order on Fuel Oil Stay status report	0.10	575.00	57.50
07/17/20	JZ	Receipt and review of Order Granting Joint Status Report and Proposed Order Modifying Case Management Deadlines in the Fuel Oil ADV case (19-388); calendar deadlines contained in order; circulate same; update electronic case profile.	0.40	195.00	78.00
07/25/20	JA	In connection with evaluating Fuel Oil litigation, review: case history of AP 453 including Adversary case (.8); Motion to Remand (.8); Response (.6); Reply (.7); Sur Reply (.4); transcript (.4); Order (.5); and Joint Scheduling Report (.3).	4.50	575.00	2,587.50
07/29/20	JZ	Conference with J. Suarez, J. Arrastia and J. Sardina regarding Fuel Oil adversary and tolled parties.	0.40	195.00	78.00
Subtotal: B191 / General Litigation			14.40		\$7,178.50
Total			20.30		\$10,571.00

Timekeeper Summary

<u>ID</u>	<u>Timekeeper Name</u>	<u>Title</u>	<u>BillHours</u>	<u>BillRate</u>	<u>BillAmount</u>
JHG	John H Genovese	Sr. Partner	1.10	765.00	841.50
JMS	Jesus M Suarez	Partner	4.30	500.00	2,150.00
MGG	Mariaelena Gayo-Guitian	Partner	1.20	575.00	690.00
JA	John Arrastia	Partner	11.10	575.00	6,382.50
JZ	Johana Zamora	Paralegal	2.60	195.00	507.00
Total			20.30		\$10,571.00

Current Fees and Costs

\$10,571.00

Genovese Joblove & Battista, P.A.

100 Southeast Second Street, 44th Floor
Miami, Florida 33131
Telephone (305) 349-2300 Facsimile (305) 349-2310
Employer ID# 65-0518134

PROMESA - Official Committee of Unsecured Creditors

September 1, 2020
Please Refer to
Invoice Number: 98854

Attn:

GJB Tax ID No. 65-0518134

Re: PROMESA: Official Committee of Unsecured Creditors / ERS Litigation - Employees Retirement System of the
~~Government - Commonwealth of Puerto Rico~~

SUMMARY / REMITTANCE COPY

Client/Matter # 12272-003
PROMESA - Official Committee of Unsecured Creditors
PROMESA: Official Committee of Unsecured Creditors / ERS Litigation - Employees Retirement System of the Government
Commonwealth of Puerto Rico

(Services rendered outside of Puerto Rico)

For fees for professional services for the period ending Jul 31, 2020	4,358.50
Costs incurred and advanced	
Current Fees and Costs Due	4,358.50

We encourage our clients to pay via ACH, however, in the event that you pay by check, please send payment to the remittance address below:

TO PROTECT AGAINST FRAUD, the Firm will not change its wiring instructions via email. We strongly encourage clients to confirm any change in wiring instructions by contacting Ken Forrest @ 305-349-2312 or via email @ kforrest@gjb-law.com and requesting written and verbal confirmation.

Wiring and ACH Instructions:

Bank Name: Biscayne Bank
Bank Telephone: 305-447-5050
Account Name: Genovese Joblove & Battista, P.A. - Operating
Routing Number : 066015767
Account Number : 21007711

Remittance Address:

Genovese Joblove & Battista, P.A.
100 Southeast Second Street, 44th Floor
Miami, Florida 33131

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Genovese Joblove & Battista, P.A.

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Miami, Florida 33131
Telephone (305) 349-2300 Facsimile (305) 349-2310
Employer ID# 65-0518134

PROMESA - Official Committee of Unsecured Creditors

September 1, 2020

Please Refer to

Invoice Number: 98854

Attn:

GJB Tax ID No. 65-0518134

Re: PROMESA: Official Committee of Unsecured Creditors / ERS Litigation - Employees Retirement System of the
~~Government Commonwealth of Puerto Rico~~

FOR PROFESSIONAL SERVICES RENDERED
for the period ending Jul 31, 2020

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
B191 / General Litigation					
07/01/20	JHG	Review and analysis of daily summary from J. Delgado to identify and analyze strategic litigation issues.	0.70	765.00	535.50
07/01/20	JZ	Revise and update amended complaint with all attachments and exhibits for A. Castaldi's review prior to filing in 19-355.	0.60	195.00	117.00
07/06/20	JMS	Review issues concerning amended complaint in 19-AP-355.	1.60	500.00	800.00
07/08/20	AMC	Review of bondholders' motion for judgment on the pleadings and ERS' response in opposition thereto.	1.20	375.00	450.00
07/09/20	JA	Review correspondence from counsel regarding expert report (.1); File amended complaint in ERS 355 (.1); Effect service of ERS AP-355 (.1)	0.30	575.00	172.50
07/09/20	JZ	Finalize and file Amended Complaint in ADV. 19-0035 with exhibits; coordinate service; update electronic case profile.	0.70	195.00	136.50
07/13/20	JA	Review Joint Urgent Motion to Modify Briefing and Discovery Schedules in various matters in which we are counsel.	0.20	575.00	115.00
07/13/20	JZ	Receipt and review of Urgent Motion to Modify Discovery and Briefing Schedules with Respect to (A) the ERS Bondholder Claims and Administrative Expense Motions and (B) Certain Issues Raised in Certain Contested Matters and Adversary Proceedings Related to the Bonds Issued by the ERS filed in Adversary cases 19-00356, 357, 359, 361, 366, 367; circulate same; update each electronic case profile.	0.50	195.00	97.50
07/14/20	JHG	Review email from Alex Bongartz analyzing ERS litigation and administrative claim and cases supporting such claims.	0.90	765.00	688.50
07/14/20	JA	Review Motion to Modify Discovery and Briefing Schedules and Order	0.20	575.00	115.00
07/14/20	JA	Review Motion to Modify Schedule in AP 356, 349, and 367 (.2);	0.20	575.00	115.00

PROMESA - Official Committee of Unsecured Creditors
12272-003
Invoice No. 98854

Page 2

07/14/20	JA	Review Orders regarding modification to discovery	0.10	575.00	57.50
07/14/20	JZ	Receipt and review of Urgent Motion to Modify Discovery and Briefing Schedules with Respect to (A) the ERS Bondholder Claims and Administrative Expense Motions and (B) Certain Issues Raised in Certain Contested Matters and Adversary Proceedings Related to the Bonds Issued by the ERS filed in the ERS case and Adversary cases 19-00356, 357, 359, 361, 366, 367; circulate same; calendar the numerous deadlines contained in the order; update each electronic case profile.	0.80	195.00	156.00
07/20/20	JA	Review Bondholders' expert rebuttal reports	1.10	575.00	632.50
07/22/20	JA	Review correspondence regarding depositions	0.10	575.00	57.50
07/27/20	AMC	Review of / analyze service related matters vis-à-vis GJB cases.	0.30	375.00	112.50
Subtotal: B191 / General Litigation			9.50		\$4,358.50
Total			9.50		\$4,358.50

Timekeeper Summary

<u>ID</u>	<u>Timekeeper Name</u>	<u>Title</u>	<u>BillHours</u>	<u>BillRate</u>	<u>BillAmount</u>
JHG	John H Genovese	Sr. Partner	1.60	765.00	1,224.00
JMS	Jesus M Suarez	Partner	1.60	500.00	800.00
JA	John Arrastia	Partner	2.20	575.00	1,265.00
AMC	Angelo M Castaldi	Associate	1.50	375.00	562.50
JZ	Johana Zamora	Paralegal	2.60	195.00	507.00
Total			9.50		\$4,358.50

Current Fees and Costs

\$4,358.50

Genovese Joblove & Battista, P.A.

100 Southeast Second Street, 44th Floor
Miami, Florida 33131
Telephone (305) 349-2300 Facsimile (305) 349-2310
Employer ID# 65-0518134

PROMESA - Official Committee of Unsecured Creditors

September 1, 2020
Please Refer to
Invoice Number: 98855

Attn:

GJB Tax ID No. 65-0518134

Re: PROMESA: Official Committee of Unsecured Creditors / HTA Litigation - Puerto Rico Highways & Transportation Authority

SUMMARY / REMITTANCE COPY

Client/Matter # 12272-004

PROMESA - Official Committee of Unsecured Creditors

PROMESA: Official Committee of Unsecured Creditors / HTA Litigation - Puerto Rico Highways & Transportation Authority

(Services rendered outside of Puerto Rico)

For fees for professional services
for the period ending Jul 31, 2020

721.50

Costs incurred and advanced

Current Fees and Costs Due

721.50

We encourage our clients to pay via ACH, however, in the event that you pay by check, please send payment to the remittance address below:

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Bank Telephone: 305-447-5050
Account Name: Genovese Joblove & Battista, P.A. - Operating
Routing Number : 066015767
Account Number : 21007711

Remittance Address:

Genovese Joblove & Battista, P.A.
100 Southeast Second Street, 44th Floor
Miami, Florida 33131

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Miami, Florida 33131
Telephone (305) 349-2300 Facsimile (305) 349-2310
Employer ID# 65-0518134

PROMESA - Official Committee of Unsecured Creditors

September 1, 2020

Please Refer to

Invoice Number: 98855

Attn:

GJB Tax ID No. 65-0518134

Re: PROMESA: Official Committee of Unsecured Creditors / HTA Litigation - Puerto Rico Highways & Transportation
Authority

FOR PROFESSIONAL SERVICES RENDERED
for the period ending Jul 31, 2020

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
B191 / General Litigation					
07/02/20	JZ	Receipt and review of Court's Opinion and Order in Connection With Preliminary Hearing Regarding Regarding Motion of Assured Guaranty Corp. et al. for Relief from Automatic Stay, or, in the Alternative, Adequate Protection [ECF 853]; calendar deadline to meet and confer; update electronic case profile.	0.30	195.00	58.50
07/10/20	JZ	Receipt and review of Urgent Motion of National Public Finance Guarantee Corporation et al. to Adjourn Deadlines for Certain Conflict Motions in relation to the Revenue Bond matters [ECF No. 863]; update electronic case profile.	0.30	195.00	58.50
07/10/20	JZ	Receipt and review of Order Scheduling Further Proceedings With the Revenue Bond Stay Relief Motions [ECF No. 864]; calendar deadlines contained in order and hearing date; circulate same and update electronic case profile.	0.40	195.00	78.00
07/13/20	JZ	Receipt and review of Order Scheduling Briefing Deadlines on Bondholders' Motion to Adjourn Deadlines for Conflict Motions [ECF No. 865]; calendar deadlines; circulate same; update electronic case profile.	0.30	195.00	58.50
07/17/20	JZ	Receipt and review of Joint Stipulation regarding DRA Parties' Motion and Memorandum of Law in Support of Their Motion for Relief from the Automatic Stay, or in the Alternative, Ordering Payment of Adequate Protection [ECF No. 13701]; circulate same; update electronic case profile.	0.30	195.00	58.50
07/17/20	JZ	Receipt and review of Urgent Motion for Bridge Order and for Appointment as Trustees Under 11 U.S.C. 926 of Ambac Assurance Corp. et al [ECF No. 871]; receipt of Declaration of William J. Natbony in support of same [ECF No. 872]; receipt and review of DRA joinder [ECF No. 873]; circulate same; update electronic case profile.	0.50	195.00	97.50

PROMESA - Official Committee of Unsecured Creditors
12272-004
Invoice No. 98855

Page 2

07/17/20	JZ	Receipt and review of Third Omnibus Motion to Extend Deadlines in Order Granting Omnibus Motion by the FOMB for PR, Acting by and Through the Members of the SCC and UCC to (I) Establish Litigation Case Management Procedures and (II) Establish Procedures for Approval of Settlements; circulate same; update electronic case profile.	0.30	195.00	58.50
07/20/20	JZ	Receipt and review of Order Setting Briefing Schedule on Third Omnibus Motion to Extend Deadlines in Order Granting Omnibus Motion by the FOMB for PR, Acting by and Through the Members of the SCC and UCC to (I) Establish Litigation Case Management Procedures and (II) Establish Procedures for Approval of Settlements; circulate same; calendar deadlines; update electronic case profile.	0.30	195.00	58.50
07/20/20	JZ	Receipt and review of Order Scheduling Briefing in Connection with Ambac's Urgent Motion for Bridge Order, and Motion for Appointment as Trustees; circulate same; calendar deadlines contained in motion; update electronic case profile.	0.40	195.00	78.00
07/20/20	JZ	Receipt and review of Order Approving Joint Stipulation regarding DRA Parties' Motion and Memorandum of Law in Support of Their Motion for Relief from the Automatic Stay, or in the Alternative, Ordering Payment of Adequate Protection; calendar deadlines [ECF No. 13732]; circulate same; update electronic case profile.	0.30	195.00	58.50
07/22/20	JZ	Receipt and review of Ambac's Consolidated Supplemental Brief Regarding Revenue Bond Lift Stay [ECF No. 880]; circulate same; update electronic case profile.	0.30	195.00	58.50
Subtotal: B191 / General Litigation			3.70		\$721.50
Total			3.70		\$721.50

Timekeeper Summary

<u>ID</u>	<u>Timekeeper Name</u>	<u>Title</u>	<u>BillHours</u>	<u>BillRate</u>	<u>BillAmount</u>
JZ	Johana Zamora	Paralegal	3.70	195.00	721.50
Total			3.70		\$721.50

Current Fees and Costs

\$721.50

Genovese Joblove & Battista, P.A.

100 Southeast Second Street, 44th Floor
Miami, Florida 33131
Telephone (305) 349-2300 Facsimile (305) 349-2310
Employer ID# 65-0518134

PROMESA - Official Committee of Unsecured Creditors

October 7, 2020
Please Refer to
Invoice Number: 99158

Attn:

GJB Tax ID No. 65-0518134

Re: PROMESA: Official Committee of Unsecured Creditors / Special Conflict Counsel

SUMMARY / REMITTANCE COPY

Client/Matter # 12272-001
PROMESA - Official Committee of Unsecured Creditors
PROMESA: Official Committee of Unsecured Creditors / Special Conflict Counsel

(Services rendered outside of Puerto Rico)

For fees for professional services for the period ending Aug 31, 2020	92,603.50
Costs incurred and advanced	<u>7,093.72</u>
Current Fees and Costs Due	99,697.22

We encourage our clients to pay via ACH, however, in the event that you pay by check, please send payment to the remittance address below:

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Wiring and ACH Instructions:

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Bank Telephone: 305-447-5050
Account Name: Genovese Joblove & Battista, P.A. - Operating
Routing Number : 066015767
Account Number : 21007711

Remittance Address:

Genovese Joblove & Battista, P.A.
100 Southeast Second Street, 44th Floor
Miami, Florida 33131

For payment, please reference the invoice, client and matter number(s) being paid.
Please refer all questions to Ken Forrest @ 305-349-2312 or via email @ kforrest@gjb-law.com

Genovese Joblove & Battista, P.A.

100 Southeast Second Street, 44th Floor
Miami, Florida 33131
Telephone (305) 349-2300 Facsimile (305) 349-2310
Employer ID# 65-0518134

PROMESA - Official Committee of Unsecured Creditors

October 7, 2020

Please Refer to

Invoice Number: 99158

Attn:

GJB Tax ID No. 65-0518134

Re: PROMESA: Official Committee of Unsecured Creditors / Special Conflict Counsel

FOR PROFESSIONAL SERVICES RENDERED
for the period ending Aug 31, 2020

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
B110 / Case Administration					
08/03/20	JZ	Review of daily summary prepared by J. Delgado and schedule matters according to pleading analysis.	0.40	195.00	78.00
08/04/20	JZ	Review of daily summary prepared by J. Delgado and schedule matters according to pleading analysis.	0.50	195.00	97.50
08/05/20	JZ	Review of daily summary prepared by J. Delgado and schedule matters according to pleading analysis.	0.40	195.00	78.00
08/05/20	JZ	Update master excel tracker list to include deadlines contained in recent orders.	1.60	195.00	312.00
08/06/20	JZ	Review of daily summary prepared by J. Delgado and schedule matters according to pleading analysis.	0.40	195.00	78.00
08/17/20	JNS	Attention to e-mail from Joyce Delgado regarding daily filings, important dates and deadlines. Attention to John Arrastia's email regarding calendaring of important deadlines. Review and [CP 68] ORDER re: [67] Joint Status Report and Proposed Order on Case Management	0.40	75.00	30.00
08/18/20	JNS	Attention to e-mail from Joyce Delgado regarding daily filings, important dates and deadlines.	0.20	75.00	15.00
08/19/20	JNS	Attention to e-mail from Joyce Delgado regarding daily filings from August 18, 2020 and important deadlines and dates. Calendar said deadlines and hearing dates: 1. D/L to file objections to the Motion to Terminate [ECF 10456] 2. Hearing on Motion to Terminate (Omnibus Hearing) 3. D/L to file and serve motions for default judgment established in the Procedures Order [ECF 13421]	0.50	75.00	37.50
08/20/20	JNS	Attention to email from Jesus Suarez regarding Third Amended Tolling Agreements. Save amended signed copies of certain amended tolling agreements in electronic case file, Update tracking spreadsheet and calendar new deadlines.	0.80	75.00	60.00

PROMESA - Official Committee of Unsecured Creditors
12272-001
Invoice No. 99158

Page 2

08/24/20	JNS	Attention to e-mails regarding update of some of the Tolling Agreements expiring on Sep 28, 2020. Update tacking chart and calendar new deadlines. E-mails to counsel attaching signed agreements	0.50	75.00	37.50
08/24/20	JZ	Review of daily summary prepared by J. Delgado and schedule matters according to pleading analysis.	0.30	195.00	58.50
08/25/20	JZ	Review of daily summary prepared by J. Delgado and schedule matters according to pleading analysis.	0.50	195.00	97.50
08/26/20	JZ	Review of daily summary prepared by J. Delgado and schedule matters according to pleading analysis.	0.40	195.00	78.00
08/27/20	JZ	Review of daily summary prepared by J. Delgado and schedule matters according to pleading analysis.	0.30	195.00	58.50
08/28/20	JZ	Review of daily summary prepared by J. Delgado and schedule matters according to pleading analysis.	0.40	195.00	78.00
08/31/20	JZ	Review of daily summary prepared by J. Delgado and schedule matters according to pleading analysis.	0.40	195.00	78.00
Subtotal: B110 / Case Administration			8.00		\$1,272.00
B113 / Pleadings Review					
08/03/20	JAD	Review and analyze all court filings in Main Case, Title III cases, and adversary proceedings for August 3, 2020 in order to prepare digest of matters relevant to special litigation counsel, prepare digest of filings, direct paraprofessionals to calendar appropriate deadlines, and circulate summary.	1.60	315.00	504.00
08/04/20	JAD	Review and analyze all court filings in Main Case, Title III cases, and adversary proceedings for August 4,2020 in order to prepare digest of matters relevant to special litigation counsel, prepare digest of filings, direct paraprofessionals to calendar appropriate deadlines, and circulate summary.	1.90	315.00	598.50
08/05/20	JAD	Review and analyze all court filings in Main Case, Title III cases, and adversary proceedings for August 5, 2020 in order to prepare digest of matters relevant to special litigation counsel, prepare digest of filings, direct paraprofessionals to calendar appropriate deadlines, and circulate summary.	1.60	315.00	504.00
08/06/20	JAD	Review and analyze all court filings in Main Case, Title III cases, and adversary proceedings for August 6, 2020 in order to prepare digest of matters relevant to special litigation counsel, prepare digest of filings, direct paraprofessionals to calendar appropriate deadlines, and circulate summary.	0.60	315.00	189.00

PROMESA - Official Committee of Unsecured Creditors
12272-001
Invoice No. 99158

Page 3

08/07/20	JAD	Review and analyze all court filings in Main Case, Title III cases, and adversary proceedings for August 7, 2020 in order to prepare digest of matters relevant to special litigation counsel, prepare digest of filings, direct paraprofessionals to calendar appropriate deadlines, and circulate summary.	0.40	315.00	126.00
08/10/20	JAD	Review and analyze all court filings in Main Case, Title III cases, and adversary proceedings for August 8 through 10, 2020 in order to prepare digest of matters relevant to special litigation counsel, prepare digest of filings, direct paraprofessionals to calendar appropriate deadlines, and circulate summary.	0.30	315.00	94.50
08/11/20	JAD	Review and analyze all court filings in Main Case, Title III cases, and adversary proceedings for August 11, 2020 in order to prepare digest of matters relevant to special litigation counsel, prepare digest of filings, direct paraprofessionals to calendar appropriate deadlines, and circulate summary.	0.70	315.00	220.50
08/12/20	JAD	Review and analyze all court filings in Main Case, Title III cases, and adversary proceedings for August 12, 2020 in order to prepare digest of matters relevant to special litigation counsel, prepare digest of filings, direct paraprofessionals to calendar appropriate deadlines, and circulate summary.	2.40	315.00	756.00
08/13/20	JAD	Review and analyze all court filings in Main Case, Title III cases, and adversary proceedings for August 13, 2020 in order to prepare digest of matters relevant to special litigation counsel, prepare digest of filings, direct paraprofessionals to calendar appropriate deadlines, and circulate summary.	2.60	315.00	819.00
08/14/20	JAD	Review and analyze all court filings in Main Case, Title III cases, and adversary proceedings for August 14, 2020 in order to prepare digest of matters relevant to special litigation counsel, prepare digest of filings, direct paraprofessionals to calendar appropriate deadlines, and circulate summary.	0.90	315.00	283.50
08/17/20	JAD	Review and analyze all court filings in Main Case, Title III cases, and adversary proceedings for August 17, 2020 in order to prepare digest of matters relevant to special litigation counsel, prepare digest of filings, direct paraprofessionals to calendar appropriate deadlines, and circulate summary.	1.20	315.00	378.00
08/18/20	JAD	Review and analyze all court filings in Main Case, Title III cases, and adversary proceedings for August 18, 2020 in order to prepare digest of matters relevant to special litigation counsel, prepare digest of filings, direct paraprofessionals to calendar appropriate deadlines, and circulate summary.	0.80	315.00	252.00

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08/19/20	JAD	Review and analyze all court filings in Main Case, Title III cases, and adversary proceedings for August 19, 2020 in order to prepare digest of matters relevant to special litigation counsel, prepare digest of filings, direct paraprofessionals to calendar appropriate deadlines, and circulate summary.	0.20	315.00	63.00
08/20/20	JAD	Review and analyze all court filings in Main Case, Title III cases, and adversary proceedings for August 20, 2020 in order to prepare digest of matters relevant to special litigation counsel, prepare digest of filings, direct paraprofessionals to calendar appropriate deadlines, and circulate summary.	0.20	315.00	63.00
08/21/20	JAD	Review and analyze all court filings in main case, Title III cases, and adversary proceedings for August 21, 2020 in order to prepare digest of matters relevant to special litigation counsel, prepare digest of filings, direct paraprofessionals to calendar appropriate deadlines, and circulate summary.	1.30	315.00	409.50
08/24/20	JAD	Review and analyze all court filings in Main Case, Title III cases, and adversary proceedings for August 22 through August 24, 2020 in order to prepare digest of matters relevant to special litigation counsel, prepare digest of filings, direct paraprofessionals to calendar appropriate deadlines, and circulate summary.	0.90	315.00	283.50
08/25/20	JAD	Review and analyze all court filings in Main Case, Title III cases, and adversary proceedings for August 25, 2020 in order to prepare digest of matters relevant to special litigation counsel, prepare digest of filings, direct paraprofessionals to calendar appropriate deadlines, and circulate summary.	1.30	315.00	409.50
08/26/20	JAD	Review and analyze all court filings in Main Case, Title III cases, and adversary proceedings for August 26, 2020 in order to prepare digest of matters relevant to special litigation counsel, prepare digest of filings, direct paraprofessionals to calendar appropriate deadlines, and circulate summary.	0.60	315.00	189.00
08/27/20	JAD	Review and analyze all court filings in Main Case, Title III cases, and adversary proceedings for August 27, 2020 in order to prepare digest of matters relevant to special litigation counsel, prepare digest of filings, direct paraprofessionals to calendar appropriate deadlines, and circulate summary.	0.80	315.00	252.00
08/28/20	JAD	Review and analyze all court filings in Main Case, Title III cases, and adversary proceedings for August 28, 2020 in order to prepare digest of matters relevant to special litigation counsel, prepare digest of filings, direct paraprofessionals to calendar appropriate deadlines, and circulate summary.	2.60	315.00	819.00

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08/31/20	JAD	Review and analyze all court filings in Main Case, Title III cases, and adversary proceedings for August 31, 2020 in order to prepare digest of matters relevant to special litigation counsel, prepare digest of filings, direct paraprofessionals to calendar appropriate deadlines, and circulate summary.	1.60	315.00	504.00
Subtotal: B113 / Pleadings Review			24.50		\$7,717.50
B150 / Meetings of Creditors					
08/03/20	JA	Prepare draft Committee email regarding [REDACTED].	0.40	575.00	230.00
08/11/20	JHG	Review UCC meeting agenda.	0.20	765.00	153.00
Subtotal: B150 / Meetings of Creditors			0.60		\$383.00
B160 / Fee/Employment Applications					
08/02/20	MGG	Emails to and from John Arrastia re: resolution of withholding tax and refund thereof.	0.30	575.00	172.50
08/03/20	MGG	Communications with Valerie Blay Soler Esq re: update on tax withholding.	0.30	575.00	172.50
08/03/20	JA	Revise June See Statement for confirmity with examiner guidelines	0.30	575.00	172.50
08/04/20	MGG	Follow up email to Valerie Bly Soler re: tax withholding and holdback amounts.	0.30	575.00	172.50
08/05/20	MGG	Emails to and from Valerie Blay Soler re: information on withholding.	0.40	575.00	230.00
08/05/20	MGG	Email to and from Valerie Blay Soler with additional information requested (.4). Email to J. Arrastia and Ken Forest (.1). Follow up detail email to Ms. Soler (.1).	0.60	575.00	345.00
08/06/20	MGG	Review analysis of withholding provided be Ken Forrest and forward to Valerie Blay Soler for submission to Hacienda .	0.50	575.00	287.50
08/06/20	MGG	Review and serve GJB March, April and May Invoices on Notice Parties.	0.60	575.00	345.00
08/06/20	CE	Preparation of GJB's Monthly Fee Statements for March, April and May including exhibits. Prepare Declarations and e-mail to K. Forrest. Calendar monthly fee objection deadline. E-mail correspondence with M. Guitian re: same.	1.50	150.00	225.00
08/07/20	CBH	Receipt and review of monthly fee statements (.2); organization for fee application (.2).	0.40	195.00	78.00
08/14/20	CE	Prepare the Monthly Fee Objection Letters for March, April and May.	0.70	150.00	105.00
08/18/20	JAD	Redact fee statements for submission without reference to privileged matters.	1.20	315.00	378.00

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08/19/20	MGG	Review redacted and unredacted invoices (.4). Review June Fee Statement Letter and serve on Notice Parties (.2). Email to Ken Forrest re: LEDES files (.1).	0.70	575.00	402.50
08/19/20	MGG	Follow up with Valerie Blay Soler and email to John Arrastia.	0.30	575.00	172.50
08/19/20	CE	Review June invoices and prepare Monthly Fee Statement for June including exhibits (.9). E-mail correspondence with K. Forrest and M. Guitian re: same (.2).	1.10	150.00	165.00
08/20/20	MGG	Receipt of email from Valerie Blay Soler re: withholding issue (.1); email to John Arrastia (.1)	0.20	575.00	115.00
08/24/20	MGG	Conference with Carolyn Esser and review of Month Fee Objections for March, April and May 2020.	0.50	575.00	287.50
08/24/20	CE	Finalize and serve Monthly Fee Objection Letters for March, April and May; e-mail correspondence with M. Guitian.	0.50	150.00	75.00
Subtotal: B160 / Fee/Employment Applications			10.40		\$3,901.00
B191 / General Litigation					
08/01/20	JA	Prepare analysis of [REDACTED].	1.90	575.00	1,092.50
08/01/20	JMS	Provide J. Arrastia with research and analysis in support of [REDACTED].	1.20	500.00	600.00
08/03/20	JA	Analysis of various [REDACTED], [REDACTED].	3.20	575.00	1,840.00
08/03/20	JA	Confer with counsel, Juan Casillas (.1); consider proposed CITI settlement (1.2).	1.30	575.00	747.50
08/03/20	JMS	Continued review of [REDACTED] and internet research supporting same.	1.60	500.00	800.00
08/04/20	JHG	Review and analysis of update on Revenue Bond litigation in email from Alex Bongartz and UCC involvement.	0.40	765.00	306.00
08/04/20	JHG	Review issues regarding litigation against CitiBank (.8); review collateral agreement with Citibank (.9); and conference with J. Arrastia regarding same (.4)	2.10	765.00	1,606.50
08/04/20	JA	Strategize with J. Genovese regarding Citibank litigation regarding collateral agreement.	0.40	575.00	230.00
08/04/20	JZ	Receipt and review of the Order granting Third Extension of Litigation Schedule for Avoidance Adversary Proceedings entered in ADV. 19-276, 19-277 and 19-279; calendar deadlines; circulate same; update each electronic case profile.	0.50	195.00	97.50
08/05/20	JA	Review and analyze publications and analysis on [REDACTED] (1.8); create visual aids and initiate report draft (1.1)	2.90	575.00	1,667.50
08/05/20	JMS	Continued review of case law relating to equitable remedies available to court related to [REDACTED].	2.30	500.00	1,150.00

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08/06/20	JHG	Review email from Alex Bongartz regarding various pending litigation issues and status.	0.60	765.00	459.00
08/06/20	JHG	Review update and attachment regarding Monolines lift stay issues (ECF 13948), limited objection of Ambac.	0.50	765.00	382.50
08/06/20	JHG	Review (ECF 13992) consolidated supplemental reply.	1.30	765.00	994.50
08/06/20	JA	Create spreadsheet analysis for [REDACTED] disclosures [REDACTED].	1.70	575.00	977.50
08/06/20	JMS	Continued review of case law relating to [REDACTED]	2.30	500.00	1,150.00
08/06/20	JZ	Receipt and review of Second Amended Stipulation and Consent Order Between the Title III Debtors (Other Than COFINA) and the AAFAF Acting on Behalf of the Governmental Entities Listed on Appendix "A" Regarding the Tolling of Statute of Limitations [ECF 13997]; update electronic case profile.	0.20	195.00	39.00
08/09/20	JA	Analyze various [REDACTED] (1.9); analyze [REDACTED] and graph same (2.4); analyze [REDACTED] (1.9)	6.20	575.00	3,565.00
08/10/20	JA	Continued analysis and review of [REDACTED] activity (2.7); review [REDACTED] (1.7); strategize regarding themes and similarities (1.4)	5.80	575.00	3,335.00
08/10/20	AMC	Attend to detailed review, analysis, and internal write-up concerning the treatment of [REDACTED] in 2019 / 2020 plans of adjustment as it relates to [REDACTED].	3.70	375.00	1,387.50
08/11/20	JHG	Review email from Alex Bongartz regarding various issues.	0.70	765.00	535.50
08/11/20	JHG	Review Doc.13 in 18-00041, review of Utier regarding objecting to report and recommendation.	0.30	765.00	229.50
08/11/20	JHG	Review Doc. 112 in 18-00041, report and recommendation on motion for leave to file amended complaint.	0.40	765.00	306.00
08/11/20	JMS	Research caselaw concerning plan objections and equitable remedies, claim transfer issues.	2.70	500.00	1,350.00
08/12/20	JHG	Review email from Alex Bongartz.	0.40	765.00	306.00
08/12/20	JHG	Review Doc. 112 filed in 18-00041, report and recommendation regarding motion to amend.	0.30	765.00	229.50
08/12/20	JHG	Review ECF 14012, memorandum order denying motion for appointment of 926 trustee.	1.30	765.00	994.50

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08/12/20	JA	Create price and volume sheets for analysis of [REDACTED] (1.8); confer with counsel for SCC regarding Tolling Agreements (.2); strategize with A. Castaldi regarding analysis [REDACTED] (.2); review email correspondence from SCC regarding Motion to Extend Default Motion Deadline with draft motion (.3); confer with other counsel regarding motion (.3)	2.80	575.00	1,610.00
08/12/20	JMS	Review issues concerning mechanics of settlement for vendor avoidance claims and committee objections.	2.40	500.00	1,200.00
08/12/20	JMS	Analysis of trading on certain [REDACTED]	1.70	500.00	850.00
08/12/20	AMC	Additional review and analysis of plans of adjustment and related disclosure statements with particularized focus on [REDACTED], and attend to review / analysis of certain Commonwealth plan presentations / powerpoints concerning the same as it relates to Bondholder relationships [REDACTED] (3.6); confer with J. Arrastia regarding analysis [REDACTED] (.2)	3.80	375.00	1,425.00
08/13/20	JHG	Review email from Alex Bongartz regarding various issues.	0.50	765.00	382.50
08/13/20	JHG	Review (ECF 14027), Cobra objection regarding unfair discrimination (.8); and strategize regarding unfair discrimination (.6)	1.40	765.00	1,071.00
08/13/20	JHG	Review (ECF 14028), objection of Fuel Line Lenders to Luma administrative expense motion.	0.90	765.00	688.50
08/13/20	JA	Continued email correspondence with SCC counsel regarding Motion to Extend Default Deadline (.2); confer with SCC counsel regarding Tolling Agreements (.1); confer and strategize with J. Suarez regarding CITI and Objection to contemplated settlement (.4)	0.70	575.00	402.50
08/13/20	JMS	Continued research of caselaw claim [REDACTED]	3.20	500.00	1,600.00
08/13/20	JMS	Confer and strategize with J. Arrastia regarding CITI and objection to contemplated settlement.	0.40	500.00	200.00
08/13/20	AMC	Review and analyze Memorandum Opinion and Order Denying the Monolines' Motion for Appointment as Trustees Under 11 U.S.C. 926 (.4); review and analyze 2012 PBA issues identified by J. Arrastia (1.2)	1.60	375.00	600.00
08/14/20	JHG	Review (ECF 2128), Utier and SREAFFE's objection regarding Luma.	1.10	765.00	841.50
08/14/20	JHG	Review email from Alex Bongartz.	0.40	765.00	306.00
08/15/20	JA	Prepare charts and analysis of [REDACTED] (2.8); research case file regarding chronological events and [REDACTED] (2.1); drafting of memoranda (1.3)	6.20	575.00	3,565.00

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08/17/20	JA	Confer with Financial Advisor regarding plan issues (.2); strategize regarding [REDACTED] (1.8); continued drafting of memorandum regarding [REDACTED] (.8); analysis of [REDACTED] and correlation as to [REDACTED] potential [REDACTED] (1.8)	4.60	575.00	2,645.00
08/17/20	AMC	Review and analyze [REDACTED] and the [REDACTED], and compare same against Court's Order [REDACTED].	1.90	375.00	712.50
08/18/20	JHG	Review email and attached notice of hearing and motion to terminate Rule 9019 motion.	0.90	765.00	688.50
08/18/20	JA	Confer with Financial Advisor and Alex Bongartz regarding plan benefit issues (.4); strategize regarding aspects of [REDACTED] (1.2); legal research and analysis regarding [REDACTED] (.9); continued drafting of memorandum (1.2); 2020 Plan [REDACTED] (.6); strategize with A. Castaldi regarding analysis of [REDACTED] (.4)	4.70	575.00	2,702.50
08/18/20	JMS	Attention to issues relating to tolling agreements for the financial party targets in AP 280.	1.40	500.00	700.00
08/18/20	AMC	Strategize with John Arrastia regarding certain issues pertaining to parties' [REDACTED], inter alia.	0.40	375.00	150.00
08/18/20	AMC	Telephone conference with J. Arrastia, A. Bongartz, and S. Martinez regarding plan benefit issues.	0.40	375.00	150.00
08/18/20	AMC	Detailed review and analysis of 2019 and 2020 plans and disclosure statements with reference to [REDACTED], the [REDACTED], and communications with John Arrastia concerning the same relating to [REDACTED].	3.20	375.00	1,200.00
08/18/20	AMC	Exhaustive review and analysis of Commonwealth's 2020 disclosure statement, with particular emphasis on discussion of Title III cases, bondholder and clawback litigation, and litigation involving debt limit issues, and cross-reference said analysis with objections / adversary complaints outlined therein.	2.60	375.00	975.00
08/19/20	JA	Continued drafting of memorandum regarding [REDACTED] (1.6); attention [REDACTED] (.4); confer with opposing counsel regarding Tolling Agreements with underwriter litigation (.2); [REDACTED] (2.4)	4.60	575.00	2,645.00
08/19/20	JMS	Review issues relating to procedural vehicles for assertion of claims against [REDACTED] and related claim transfer issues with respect to [REDACTED].	3.20	500.00	1,600.00
08/19/20	AMC	Extensive research and analysis concerning [REDACTED].	4.40	375.00	1,650.00
08/20/20	JHG	Review email from Alex Bongartz regarding UCC updates.	0.60	765.00	459.00

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08/20/20	JHG	Review (ECF 2146) Utter limited joinder.	0.30	765.00	229.50
08/20/20	JMS	Review issues concerning 23 tolling agreements with financial party targets in AP 280.	1.80	500.00	900.00
08/20/20	AMC	Detailed review and analysis of [REDACTED].	4.90	375.00	1,837.50
08/23/20	AMC	Detailed review and analysis of numerous bond sub-series / CUSIPS within Public Improvement Ref. Bonds, Series 2012 A.	3.80	375.00	1,425.00
08/24/20	JMS	Review issues concerning numerous tolling agreements of financial party targets in AP 280.	1.80	500.00	900.00
08/24/20	JA	Prepare and revise document subpoena to CITI (.3); confer with opposing counsel regarding meet and confer relating to discovery (.3); finalize subpoena to CITI (.3); review additional Tolling Agreements and execute same (.2); review Motion to Modify Briefing Schedule ECF 14087 (.2); review Addendum to Tolling Agreement (.1)	1.40	575.00	805.00
08/24/20	AMC	Review and execute additional tolling agreements relating to certain tolled parties	0.20	375.00	75.00
08/24/20	AMC	Review / analyze proposed briefing schedule set forth in ECF No. 14086	0.20	375.00	75.00
08/25/20	JA	Review follow up correspondence regarding meet and confer on discovery issues (.1); additional review and analysis of additional elements of memorandum concerning [REDACTED] drafting of conclusions and observations (2.8); analysis and consideration of potential remedies and consideration of standing of Committee to pursue remedies (2.2)	5.10	575.00	2,932.50
08/25/20	JMS	Continued review of issues relating to assertion of claims against tolled financial party targets (1.9); continued research relating to available procedural vehicles for assertion of claims against [REDACTED] (2.4)	4.30	500.00	2,150.00
08/26/20	JHG	Review email from Alex Bongartz with attention to litigation issues.	0.60	765.00	459.00
08/26/20	JA	Analysis of obligations of mediation agreement as to [REDACTED] (1.9); incorporate into memorandum (.7); review legal analysis regarding implementation of [REDACTED] (1.1)	3.70	575.00	2,127.50
08/26/20	JNS	Attention to e-mails regarding update of additional Tolling Agreements expiring on Sep 28, 2020. Update tacking chart and calendar new deadlines. E-mails to counsel attaching signed agreements.	0.40	75.00	30.00

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08/26/20	JZ	Receipt and review of Order Granting Ambac and the FOMB's Urgent Motion for a Second Adjournment of Ambac's Motion to Strike Certain Provisions of the Amended PSA and extending the associated deadlines [ECF 14109]; calendar response deadlines; update electronic case profile.	0.30	195.00	58.50
08/27/20	JA	Review correspondence from opposing counsel regarding discovery meet & confer (.1); additional research and analysis of [REDACTED] and [REDACTED] (1.7); [REDACTED] (1.1); initial preparation of powerpoint as executive summary (1.3)	4.20	575.00	2,415.00
08/31/20	JA	Review Order regarding Briefing Schedule on Motion to Compel (.1); continued preparation of Memorandum regarding [REDACTED] (1.2); analysis of [REDACTED] (.6); create multiple charts and exhibits to memorandum from previously examined data (3.1) [REDACTED] (.7)	5.70	575.00	3,277.50
08/31/20	AMC	Attend to research concerning remedies for [REDACTED]	3.20	375.00	1,200.00
Subtotal: B191 / General Litigation			148.10		\$78,295.00
B260 / Meetings of and Communications with Board					
08/05/20	JA	Confer with Committee regarding settlement request and strategy.	0.60	575.00	345.00
08/12/20	JA	Attend and participate in Committee call with regard to litigation issues (.3); confer with Committee Chair regarding Tolling Agreements (.1)	0.40	575.00	230.00
08/17/20	JA	Prepare update to Committee on tolling party issues.	0.20	575.00	115.00
08/19/20	JA	Prepare for and present litigation update for Committee.	0.60	575.00	345.00
Subtotal: B260 / Meetings of and Communications with Board			1.80		\$1,035.00
Total			193.40		\$92,603.50

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Timekeeper Summary

<u>ID</u>	<u>Timekeeper Name</u>	<u>Title</u>	<u>BillHours</u>	<u>BillRate</u>	<u>BillAmount</u>
JHG	John H Genovese	Sr. Partner	15.20	765.00	11,628.00
JMS	Jesus M Suarez	Partner	30.30	500.00	15,150.00
MGG	Mariaelena Gayo-Guitian	Partner	4.70	575.00	2,702.50
JA	John Arrastia	Partner	69.60	575.00	40,020.00
JAD	Joyce A Delgado	Associate	25.70	315.00	8,095.50
AMC	Angelo M Castaldi	Associate	34.30	375.00	12,862.50
JNS	Jessey N Sardina	Paralegal	2.80	75.00	210.00
CE	Carolyn Esser	Paralegal	3.80	150.00	570.00
CBH	Colleen B Hopkins	Paralegal	0.40	195.00	78.00
JZ	Johana Zamora	Paralegal	6.60	195.00	1,287.00
Total			193.40		\$92,603.50

Costs and incurrent and advanced

<u>Date</u>	<u>Description</u>	<u>Amount</u>
08/31/2020	Data management and hosting (12272-001) Trustpoint.One 20-08515	7,093.72

Total Costs incurrent and advanced

\$7,093.72

Current Fees and Costs

\$99,697.22

Genovese Joblove & Battista, P.A.

100 Southeast Second Street, 44th Floor
Miami, Florida 33131
Telephone (305) 349-2300 Facsimile (305) 349-2310
Employer ID# 65-0518134

PROMESA - Official Committee of Unsecured Creditors

October 7, 2020
Please Refer to
Invoice Number: 99159

Attn:

GJB Tax ID No. 65-0518134

Re: PROMESA: Official Committee of Unsecured Creditors / PREPA Adversary - Puerto Rico Electric Power Authority

SUMMARY / REMITTANCE COPY

Client/Matter # 12272-002

PROMESA - Official Committee of Unsecured Creditors

PROMESA: Official Committee of Unsecured Creditors / PREPA Adversary - Puerto Rico Electric Power Authority

(Services rendered outside of Puerto Rico)

For fees for professional services for the period ending Aug 31, 2020	20,684.50
Costs incurred and advanced	
Current Fees and Costs Due	20,684.50

We encourage our clients to pay via ACH, however, in the event that you pay by check, please send payment to the remittance address below:

TO PROTECT AGAINST FRAUD, the Firm will not change its wiring instructions via email. We strongly encourage clients to confirm any change in wiring instructions by contacting Ken Forrest @ 305-349-2312 or via email @ kforrest@gjb-law.com and requesting written and verbal confirmation.

Wiring and ACH Instructions:

Bank Name: Biscayne Bank
Bank Telephone: 305-447-5050
Account Name: Genovese Joblove & Battista, P.A. - Operating
Routing Number : 066015767
Account Number : 21007711

Remittance Address:

Genovese Joblove & Battista, P.A.
100 Southeast Second Street, 44th Floor
Miami, Florida 33131

For payment, please reference the invoice, client and matter number(s) being paid.
Please refer all questions to Ken Forrest @ 305-349-2312 or via email @ kforrest@gjb-law.com

Genovese Joblove & Battista, P.A.

100 Southeast Second Street, 44th Floor
Miami, Florida 33131
Telephone (305) 349-2300 Facsimile (305) 349-2310
Employer ID# 65-0518134

PROMESA - Official Committee of Unsecured Creditors

October 7, 2020

Please Refer to

Invoice Number: 99159

Attn:

GJB Tax ID No. 65-0518134

Re: PROMESA: Official Committee of Unsecured Creditors / PREPA Adversary - Puerto Rico Electric Power Authority

FOR PROFESSIONAL SERVICES RENDERED
for the period ending Aug 31, 2020

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
B191 / General Litigation					
08/03/20	JA	Review Status Report of Government Parties.	0.30	575.00	172.50
08/03/20	JZ	Receipt and review of PREPA's Urgent Motion to Extend Briefing Deadlines in Connection with it's Omnibus Motion to Rejection Certain PPOAs; circulate same; update electronic case profile.	0.30	195.00	58.50
08/04/20	AMC	Review of Order Granting Urgent Motion to Extend Certain Briefing Deadlines in Connection with PREPA's Omnibus Motion for Entry of an Order Authorizing PREPA to Reject Certain PPOAs and Joint Status Report ECF 13954.	0.30	375.00	112.50
08/04/20	JZ	Receipt and review of Order Granting Urgent Motion to Extend Certain Briefing Deadlines in Connection with PREPA's Omnibus Motion for Entry of an Order Authorizing PREPA to Reject Certain PPOAs; calendar deadlines and hearing date; circulate same; update electronic case profile.	0.30	195.00	58.50
08/04/20	JZ	Receipt and review of Joint Status Report concerning the Administrative Expense Motion for LUMA Energy filed by the Government Parties along with the UCC, Fuel Line Lenders, UTIER, SREAEE, and Whitefish as the Anticipated Objectors; circulate same; update electronic case profile.	0.20	195.00	39.00
08/05/20	JHG	Review correspondence and proposed motion to terminate PREPA RSA.	1.20	765.00	918.00
08/05/20	JZ	Receipt and review of Order Setting Deadline for Further Status Report Regarding the COVID-19 Pandemic and the 9019 Motion[ECF No. 13988]; calendar deadline to file next status report; circulate same; update electronic case profile.	0.30	195.00	58.50
08/05/20	JZ	Receipt and review of Order of Reference to Magistrate Judge Judith Dein for discovery disputes in connection with PREPA's Administrative Expense Motion regarding LUMA Energy [ECF 13989]; circulate same; update electronic case profile.	0.20	195.00	39.00

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08/07/20	AMC	Detailed review and analysis of extensive "statement of undisputed facts" submitted by Vitol Inc. and review in furtherance thereof specific contractual allegations and exhibits.	2.10	375.00	787.50
08/08/20	AMC	With respect to Adv. Proc. No. 19-00453, PREPA v. Vitol Inc., et al., review of legal arguments and authorities cited by Vitol in its summary judgment papers concerning enforceability of underlying fuel oil contracts, and additional review of multitudinous "exhibits" in support of said arguments	3.40	375.00	1,275.00
08/10/20	JHG	Review and analysis of Marrero class action.	1.40	765.00	1,071.00
08/10/20	JHG	Review and analyze Prepa Fuel Oil complaint as it relates to litigation strategy.	1.30	765.00	994.50
08/11/20	JHG	Review draft limited objection of UCC to Prepa motion for order allowing administrative claim regarding Luma.	0.60	765.00	459.00
08/12/20	JA	Review revised Proposed Order regarding Intervention and discuss with SCC.	0.30	575.00	172.50
08/14/20	JMS	Research issues concerning scope of proposed intervention of Marrero plaintiffs.	2.30	500.00	1,150.00
08/14/20	JA	Confer with SCC counsel, Chelsea Mullaney, regarding Joint Status Report (.6); strategize (.3)	0.90	575.00	517.50
08/14/20	AMC	Attend to communications from counsel for the Special Claims Committee concerning joint status report and other issues concerning 19-388 (.3), and attend to review / analysis of the parties prior briefed positions concerning putative intervention and the scope thereof (.8)	1.10	375.00	412.50
08/14/20	AMC	Telephone conference with counsel for the Special Claims Committee and J. Arrastia.	0.60	375.00	225.00
08/16/20	JA	Email correspondence to and from SCC counsel regarding Joint Status Report and Proposed Orders (.6); receive, review and revise Joint Status Report (.8)	1.40	575.00	805.00
08/17/20	JHG	Review Prepa objection to motion for relief from stay (ECF 14053).	0.30	765.00	229.50
08/17/20	JA	Confer with counsel at Brown Rudnick (.2); review final version of filing (.2)	0.40	575.00	230.00
08/17/20	JMS	Continued review of issues relating to proposed intervention and research in support of litigation strategy (injunctive relief questions)	1.70	500.00	850.00
08/17/20	AMC	Review of final status report for filing in 19-388.	0.20	375.00	75.00
08/18/20	JHG	Review and analyze (ECF 14057), PREPA reply to objection to urgent motion to reject contracts.	1.40	765.00	1,071.00

PROMESA - Official Committee of Unsecured Creditors
12272-002
Invoice No. 99159

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08/18/20	JMS	Attention to issues relating to amendment of complaint, inclusion of additional theories of recovery and intervention (1.9); consideration of issues relating to intervention (.8)	2.70	500.00	1,350.00
08/20/20	JHG	Review attached Prepa omnibus reply (ECF 2145).	0.70	765.00	535.50
08/24/20	JMS	Attention to 9019 Discovery issues regarding request for production of documents and prior discovery.	1.40	500.00	700.00
08/24/20	AMC	Draft, revise, and finalize subpoena duces tecum for service on Citigroup (.9), research local rules concerning service of the same (.9), and attend to myriad communications concerning the same (.4)	2.20	375.00	825.00
08/24/20	AMC	Analyze parties' collective positions concerning discovery served in PREPA case concerning the Rule 9019 termination motion (.7), and appear at good faith conference concerning the same (.4)	1.10	375.00	412.50
08/24/20	JZ	Conference with A. Castaldi regarding serving discovery upon Citi Global Market; draft subpoena (.2); revise documents sought (.2); e-mail same to A. Castaldi for review; calendar compliance date (.1); update electronic case profile (.2)	0.70	195.00	136.50
08/26/20	JMS	Review issues concerning intervention and research and development of litigation strategy concerning Marrero Plaintiffs.	1.80	500.00	900.00
08/27/20	JMS	Continued issues concerning intervention and research and development of litigation strategy concerning Marrero Plaintiffs (attention to injunctive relief issues).	1.40	500.00	700.00
08/27/20	JA	Review correspondence following up on meet & confer on CITI and other targets relating to PREPA RSA 9019 (.1); review and analyze draft Motion to Compel Discovery and Motion to Dismiss PREPA 9019 (.6); strategize with Nick Bassett (.2)	0.90	575.00	517.50
08/28/20	JMS	Continued issues concerning intervention and research and development of litigation strategy concerning Marrero Plaintiffs (attention to appellate issues).	1.70	500.00	850.00
08/28/20	JZ	Receipt and review of UCC's Urgent Motion to Compel Discovery in Connection with its Motion to Terminate Bankruptcy Rule 9019 Motion [ECF 14127]; circulate same; update electronic case profile.	0.30	195.00	58.50
08/28/20	JZ	Receipt and review of UCC's Unopposed Urgent Motion to Set Briefing Schedule and Hearing on the Motion to Compel [ECF No. 14128]; update electronic case profile.	0.20	195.00	39.00
08/31/20	JA	Review Response to Joint Status Request and prepare Order (.6); confer with J. Suarez (.4); strategize (.3)	1.30	575.00	747.50
08/31/20	AMC	Conduct research concerning potential causes of action / requests for relief concerning individual creditors' assertions of derivative claims	2.40	375.00	900.00

PROMESA - Official Committee of Unsecured Creditors
12272-002
Invoice No. 99159

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08/31/20	JZ	Receipt and review of Order Setting Briefing Schedule on Urgent Motion to Compel Discovery in Connection with its Motion to Terminate Bankruptcy Rule 9019 Motion; calendar deadlines; update electronic case profile.	0.30	195.00	58.50
Subtotal: B191 / General Litigation			41.60		\$20,512.00
B260 / Meetings of and Communications with Board					
08/16/20	JA	Prepare status update to Committee regarding pending litigation issues in Fuel Oil case.	0.30	575.00	172.50
Subtotal: B260 / Meetings of and Communications with Board			0.30		\$172.50
Total			41.90		\$20,684.50

Timekeeper Summary

<u>ID</u>	<u>Timekeeper Name</u>	<u>Title</u>	<u>BillHours</u>	<u>BillRate</u>	<u>BillAmount</u>
JHG	John H Genovese	Sr. Partner	6.90	765.00	5,278.50
JMS	Jesus M Suarez	Partner	13.00	500.00	6,500.00
JA	John Arrastia	Partner	5.80	575.00	3,335.00
AMC	Angelo M Castaldi	Associate	13.40	375.00	5,025.00
JZ	Johana Zamora	Paralegal	2.80	195.00	546.00
Total			41.90		\$20,684.50

Current Fees and Costs

\$20,684.50

Genovese Joblove & Battista, P.A.

100 Southeast Second Street, 44th Floor
Miami, Florida 33131
Telephone (305) 349-2300 Facsimile (305) 349-2310
Employer ID# 65-0518134

PROMESA - Official Committee of Unsecured Creditors

October 7, 2020
Please Refer to
Invoice Number: 99160

Attn:

GJB Tax ID No. 65-0518134

Re: PROMESA: Official Committee of Unsecured Creditors / ERS Litigation - Employees Retirement System of the
~~Government - Commonwealth of Puerto Rico~~

SUMMARY / REMITTANCE COPY

Client/Matter # 12272-003

PROMESA - Official Committee of Unsecured Creditors

PROMESA: Official Committee of Unsecured Creditors / ERS Litigation - Employees Retirement System of the Government
Commonwealth of Puerto Rico

(Services rendered outside of Puerto Rico)

For fees for professional services
for the period ending Aug 31, 2020

2,300.00

Costs incurred and advanced

Current Fees and Costs Due

2,300.00

We encourage our clients to pay via ACH, however, in the event that you pay by check, please send payment to the remittance address below:

TO PROTECT AGAINST FRAUD, the Firm will not change its wiring instructions via email. We strongly encourage clients to confirm any change in wiring instructions by contacting Ken Forrest @ 305-349-2312 or via email @ kforrest@gjb-law.com and requesting written and verbal confirmation.

Wiring and ACH Instructions:

Bank Name: Biscayne Bank
Bank Telephone: 305-447-5050
Account Name: Genovese Joblove & Battista, P.A. - Operating
Routing Number : 066015767
Account Number : 21007711

Remittance Address:

Genovese Joblove & Battista, P.A.
100 Southeast Second Street, 44th Floor
Miami, Florida 33131

For payment, please reference the invoice, client and matter number(s) being paid.
Please refer all questions to Ken Forrest @ 305-349-2312 or via email @ kforrest@gjb-law.com

Genovese Joblove & Battista, P.A.

100 Southeast Second Street, 44th Floor
Miami, Florida 33131
Telephone (305) 349-2300 Facsimile (305) 349-2310
Employer ID# 65-0518134

PROMESA - Official Committee of Unsecured Creditors

October 7, 2020
Please Refer to
Invoice Number: 99160

Attn:

GJB Tax ID No. 65-0518134

Re: PROMESA: Official Committee of Unsecured Creditors / ERS Litigation - Employees Retirement System of the
~~Government Commonwealth of Puerto Rico~~

FOR PROFESSIONAL SERVICES RENDERED
for the period ending Aug 31, 2020

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
B191 / General Litigation					
08/04/20	JHG	Review email from Alex Bongartz and analysis of Federal Court of Claims litigation and ERS bondholders current arguments.	0.70	765.00	535.50
08/13/20	JHG	Review petition for cert filed by Andalusian regarding lien on future ERS payments.	0.80	765.00	612.00
08/13/20	JHG	Review ECF 960 in Adv. 17-03566, ERS reply in support of judgment on the pleadings.	0.90	765.00	688.50
08/24/20	JA	Review Urgent Joint Motion to Modify Briefing Schedule in AP 361.	0.20	575.00	115.00
08/24/20	JZ	Receipt and review of the Joint Urgent Motion to Modify Briefing Schedule With Respect to Certain Issues Raised in Certain Contested Matters and Adversary Proceedings Related to the Bonds Issues by the ERS, filed by the Government Parties (including the UCC) filed in Adv. Proc. Nos. AP 19-00355, 356, 357, 359, 361, 366, and 367; circulate filings; update each electronic case profile.	0.50	195.00	97.50
08/25/20	JA	Review Order Modifying Briefing Schedule in various GJB matters.	0.20	575.00	115.00
08/25/20	JZ	Receipt and review of Order Granting Joint Urgent Motion to Modify Briefing Schedule With Respect to Certain Issues Raised in Certain Contested Matters and Adversary Proceedings Related to the Bonds Issues by the ERS, filed in Adv. Proc. Nos. AP 19-00355, 356, 357, 359, 361, 366, and 367; circulate filings; calendar all deadline contained in the order; update each electronic case profile.	0.70	195.00	136.50
Subtotal: B191 / General Litigation			4.00		\$2,300.00
Total			4.00		\$2,300.00

PROMESA - Official Committee of Unsecured Creditors
12272-003
Invoice No. 99160

Page 2

Timekeeper Summary

<u>ID</u>	<u>Timekeeper Name</u>	<u>Title</u>	<u>BillHours</u>	<u>BillRate</u>	<u>BillAmount</u>
JHG	John H Genovese	Sr. Partner	2.40	765.00	1,836.00
JA	John Arrastia	Partner	0.40	575.00	230.00
JZ	Johana Zamora	Paralegal	1.20	195.00	234.00
	Total		4.00		\$2,300.00

Current Fees and Costs

\$2,300.00

Genovese Joblove & Battista, P.A.

100 Southeast Second Street, 44th Floor
Miami, Florida 33131
Telephone (305) 349-2300 Facsimile (305) 349-2310
Employer ID# 65-0518134

PROMESA - Official Committee of Unsecured Creditors

October 7, 2020
Please Refer to
Invoice Number: 99161

Attn:

GJB Tax ID No. 65-0518134

Re: PROMESA: Official Committee of Unsecured Creditors / HTA Litigation - Puerto Rico Highways & Transportation Authority

SUMMARY / REMITTANCE COPY

Client/Matter # 12272-004

PROMESA - Official Committee of Unsecured Creditors

PROMESA: Official Committee of Unsecured Creditors / HTA Litigation - Puerto Rico Highways & Transportation Authority

(Services rendered outside of Puerto Rico)

For fees for professional services
for the period ending Aug 31, 2020

439.50

Costs incurred and advanced

Current Fees and Costs Due

439.50

We encourage our clients to pay via ACH, however, in the event that you pay by check, please send payment to the remittance address below:

TO PROTECT AGAINST FRAUD, the Firm will not change its wiring instructions via email. We strongly encourage clients to confirm any change in wiring instructions by contacting Ken Forrest @ 305-349-2312 or via email @ kforrest@gjb-law.com and requesting written and verbal confirmation.

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Routing Number : 066015767
Account Number : 21007711

Remittance Address:

Genovese Joblove & Battista, P.A.
100 Southeast Second Street, 44th Floor
Miami, Florida 33131

For payment, please reference the invoice, client and matter number(s) being paid.
Please refer all questions to Ken Forrest @ 305-349-2312 or via email @ kforrest@gjb-law.com

Genovese Joblove & Battista, P.A.

100 Southeast Second Street, 44th Floor
Miami, Florida 33131
Telephone (305) 349-2300 Facsimile (305) 349-2310
Employer ID# 65-0518134

PROMESA - Official Committee of Unsecured Creditors

October 7, 2020

Please Refer to

Invoice Number: 99161

Attn:

GJB Tax ID No. 65-0518134

Re: PROMESA: Official Committee of Unsecured Creditors / HTA Litigation - Puerto Rico Highways & Transportation
Authority

FOR PROFESSIONAL SERVICES RENDERED
for the period ending Aug 31, 2020

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
B191 / General Litigation					
08/03/20	JZ	Receipt and review of Moving Parties' Reply to Monolines' Limited Objection to Urgent Motion for Entry of an Order Approving Second Amended Stipulation and for Consent Order Between the Title III Debtors and the FOMB and AAFAF Regarding the Tolling of the Statute of Limitations [ECF No. 13939]; circulate same; update electronic case profile.	0.30	195.00	58.50
08/04/20	AMC	Review of Limited Objection to the Urgent Motion for Approval of Tolling Stipulation [ECF 13892]	0.20	375.00	75.00
08/26/20	JHG	Review HTA notice of appeal and orders appealed from (ECF 914 in 17-03567).	0.40	765.00	306.00
Subtotal: B191 / General Litigation			0.90		\$439.50
Total			0.90		\$439.50

Timekeeper Summary

<u>ID</u>	<u>Timekeeper Name</u>	<u>Title</u>	<u>BillHours</u>	<u>BillRate</u>	<u>BillAmount</u>
JHG	John H Genovese	Sr. Partner	0.40	765.00	306.00
AMC	Angelo M Castaldi	Associate	0.20	375.00	75.00
JZ	Johana Zamora	Paralegal	0.30	195.00	58.50
Total			0.90		\$439.50

Current Fees and Costs

\$439.50

SCHEDULE 3

PROPOSED ORDER

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

In re:

**THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO RICO,**

as representative of

THE COMMONWEALTH OF PUERTO RICO, *et al.*,

Debtors.¹

**PROMESA
Title III**

No. 17 BK 3283-LTS

(Jointly Administered)

**ORDER GRANTING FOURTH INTERIM FEE APPLICATION OF GENOVESE
JOBLOVE & BATTISTA, P.A. AS SPECIAL LITIGATION COUNSEL TO
OFFICIAL COMMITTEE OF UNSECURED CREDITORS, FOR SERVICES
RENDERED AND REIMBURSEMENT OF EXPENSES
FOR PERIOD FROM FEBRUARY 1, 2020-AUGUST 31, 2020**

Upon consideration of the Fourth Interim Fee Application (the “Application”)² of Genovese Joblove & Battista, P.A. (“GJB”), as special litigation counsel to the Official Committee of Unsecured Creditors of all Title III Debtors (other than COFINA) (the “Committee”), for an order pursuant to sections 316 and 317 of PROMESA, section 503(b) of the Bankruptcy Code made applicable to these cases by section 301(a) of PROMESA, Bankruptcy Rule 2016, and Local Rule 2016-1, for allowance of compensation and reimbursement of expenses for the period from

¹ The Debtors in these jointly-administered PROMESA title III cases, along with each Debtor’s respective title III case number listed as a bankruptcy case number due to software limitations and the last four (4) digits of each Debtor’s federal tax identification number, as applicable, are: (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation (Bankruptcy Case No. 17 BK 3284) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (Bankruptcy Case No. 17 BK 3566-LTS) (Last Four Digits of Federal Tax ID: 9686); (v) Puerto Rico Electric and Power Authority (Bankruptcy Case No. 17 BK 4780) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority (Bankruptcy Case No. 19 BK 5523-LTS) (Last Four Digits of Federal Tax ID: 3801).

² Capitalized terms not defined herein shall have the meanings ascribed to them in the Application.

February 1, 2020 through August 31, 2020, the Court hereby FINDS AND DETERMINES that (i) the Court has jurisdiction to consider the Application and the relief requested therein pursuant to section 306(a) of PROMESA; (ii) venue is proper before this Court pursuant to section 307(a) of PROMESA; (iii) due and proper notice of the Application has been provided under the particular circumstances and no other or further notice need be provided; (iv) any objections to the Application having been resolved; (v) all persons with standing having been afforded the opportunity to be heard on the Application; and after due deliberation and sufficient cause appearing therefor, it is hereby **ORDERED THAT:**

1. The Application is granted on an interim basis.
2. GJB's claim for fees and expenses for services rendered during the Application Period and reimbursement for actual and necessary expenses incurred during the Application Period are hereby allowed in the amounts of \$1,124,542.00 and \$56,687.18, respectively.
3. To the extent the amounts described in paragraph 2 hereof have not already been paid pursuant to the Interim Compensation Order, (a) the Debtors are directed to pay GJB the outstanding fees in the amount of \$1,124,542.00 which represents 100% of the fees requested within fourteen days of the date of this Order, and any such payment shall be made net of any payments made by the Debtors pursuant to the Interim Compensation Order, withholding or other applicable taxes, and (b) the Debtors are directed to reimburse GJB for its outstanding expenses in the amount of \$56,687.18, which represents 100% of the expenses requested within fourteen days of the date of this Order.
4. This Court shall retain jurisdiction to hear and determine all matters arising from the implementation of this Order.
5. GJB is authorized and empowered to take all necessary actions to implement the

relief granted in this Order.

6. Notwithstanding the possible applicability of Bankruptcy Rules 6006(d), 7062, 9014, or otherwise, the terms and conditions of this Order shall be immediately effective and enforceable upon its entry.

7. All time periods set forth in this Order shall be calculated in accordance with Bankruptcy Rule 9006(a).

Dated: _____, 2020.

HON. LAURA TAYLOR SWAIN
UNITED STATES DISTRICT JUDGE